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December 11, 1998

**RECEIVED**

DEC 11 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**VIA HAND DELIVERY**

Magalie Salas, Esq.

Secretary

Federal Communications Commission

1919 M Street, N.W., Room 222

Washington, DC 20054

Re: CS Docket No. 98-201; RM No. 9335; RM No. 9345  
Satellite Delivery of Network Signals to Unserved Households  
for Purposes of the Satellite Home Viewer Act  
Comments of the New Mexico Broadcasters Association

Dear Ms. Salas:

Enclosed, on behalf of the New Mexico Broadcasters Association, are the original and 11 copies of its Comments in CS Docket No. 98-201; RM No. 9335; RM No. 9345.

If you have any questions, please contact me.

Very truly yours,



Paul J. Feldman

Counsel for

The New Mexico Broadcasters  
Association

PJF/jr

Enclosures

cc: Mr. Don Fowler (w/encl.)  
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BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Satellite Delivery of Network Signals	)	CS Docket No. 98-201
to Unserved Households for	)	RM No. 9335
Purposes of the Satellite Home	)	RM No. 9345
Viewer Act	)	
	)	
Part 73 Definition and Measurement	)	
of Signals of Grade B Intensity	)	

**COMMENTS OF THE NEW MEXICO BROADCASTERS ASSOCIATION**

**THE NEW MEXICO BROADCASTERS  
ASSOCIATION**

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December 11, 1998

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**COMMENTS OF THE NEW MEXICO BROADCASTERS ASSOCIATION**

The New Mexico Broadcasters Association ("NMBA"), by their attorneys, hereby file these comments in response to the Commission's Notice of Proposed Rulemaking, released November 17, 1998 in the above-captioned proceeding ("*Notice*"). NMBA strongly urges the Commission to reject proposed modifications to the definition of Grade B signal intensity that would impermissibly and irrationally reduce a station's protected Grade B area to a minor fraction of its existing service area, thus substantially impairing the ability of stations to provide free over-the-air local service to their communities, and to low income rural viewers who obtain their only service through the extensive network of translators operated by NMBA stations. Such a result would be contrary not only to Congressional intent, but to long-standing Commission policies, and the public interest.

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## **I. Introduction**

Members of NMBA operate full power, network affiliated television stations.<sup>1</sup>

Each of these stations have, for many years, provided high quality service to their communities, including important news, weather, public affairs, public service announcements and other programming directed to meet the needs of their communities for local information. Furthermore, in order to provide service to rural low income viewers disbursed throughout the 160,000 square miles of New Mexico, the NMBA affiliate stations operate an extensive network of 298 translators. See Exhibit A, attached hereto.<sup>2</sup> However, as discussed more fully below, the production costs of producing local programming and maintaining a substantial translator network are high, and the proposals in this proceeding seriously threaten the economic basis for the production and broadcast of local programming.

As members of their communities, the NMBA Stations do not begrudge their neighbors the right to receive network programming by satellite if such viewers truly cannot receive the over-the-air signal of their local affiliates. The NMBA Stations regularly grant waiver requests from viewers who demonstrate that, pursuant to the

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<sup>1</sup> NMBA network affiliate stations are as follows: KASY-TV, Albuquerque (UPN); KOAT-TV, Albuquerque (ABC); KOB-TV, Albuquerque (NBC); KRQE(TV), Albuquerque (CBS); KOCT(TV), Carlsbad (ABC); KVIH-TV, Clovis (ABC); KOB(TV), Farmington (NBC); KHFT(TV), Hobbs (UPN); KZIA(TV), Las Cruces (UPN); KBIM-TV, Roswell (CBS); KOBR(TV), Roswell (NBC); KASA-TV, Sante Fe (FOX); KOVT(TV), Silver City (ABC).

<sup>2</sup> Exhibit A contains a map of the translators operated by Stations KOAT (ABC), KOB (NBC), KRQE (CBS) and KASA (Fox). In addition, Exhibit A contains a list of all of the 298 translators operated by the four above affiliates plus KASY (UPN) in the State of New Mexico. The map does not have 298 dots because it does not reflect KASY translators, and because one dot can reflect multiple translators in one site.

Satellite Home Viewer Act ("SHVA"), they cannot receive a Grade B signal "through use of a conventional outdoor rooftop antenna."<sup>3</sup> However, the proposals of the National Rural Telecommunications Cooperative ("NRTC") and EchoStar Communications Corporation ("EchoStar") ask the Commission to make unauthorized revisions to its rules that would not only contradict the Commission's policies on localism, they would so substantially decrease a station's protected service area, as to make a mockery out of the term "unserved household."

**II. The Proposed Revisions to the Definition of Grade B Signal Intensity Would Impermissibly and Irrationally Reduce a Station's Protected Area of Exclusivity to a Minor Fraction of its Current Area.**

As stated in paragraph 9 of the *Notice*, NRTC asks the Commission to adopt, for the purposes of interpreting SHVA, a new definition of "unserved household" to include those households located outside of a "Grade B " contour in which 100 percent of the population receives over-the-air coverage by a network affiliate 100 percent of the time, using "readily available, affordable receiving equipment." EchoStar urges the Commission to endorse a predictive model under which an "unserved household" would be defined as those outside of an area where 99 percent of households receive a Grade B signal 99 percent of the time with a 99 percent level of confidence. By reducing the "Grade B" contour for purposes of SHVA, the satellite operators hope to substantially reduce the area in which affiliates hold the exclusive rights to deliver network programming, and thus hope to increase the number of "unserved households" to which satellite operators can deliver such programming. However, both the

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<sup>3</sup> See 17 U.S.C. § 119(d)(10)(A).

redefinition of the Grade B intensity standard for SHVA, and the resulting massive reduction of the area of an affiliate's exclusivity, are patently inconsistent with Congressional intent in the enactment of SHVA.

A. *Congress Explicitly Intended to "Freeze" the 1988 Definition of Grade B Signal Intensity for Purposes of SHVA Enforcement.*

The *Notice* wisely seeks comments as to whether the Commission even has authority to revise the definition of Grade B signal intensity for purposes of SHVA. The answer appears to be clear, however, that Congress intended to "freeze" the 1988 definition of Grade B signal intensity into the definition of "unserved household". The *House Report* explicitly defines "unserved household" as "a household that with respect to a particular network; (A) cannot receive, through the use of a conventional outdoor antenna, a signal of Grade B intensity (as defined by the FCC *currently* in 47 C.F.R. Section 73.683(a))".<sup>4</sup> The word "currently" could not be more explicit, and obviously refers to the definition of Grade B as it existed in 1988. While the Commission certainly has the authority to revise Section 73.683(a) of its rules, even if the Commission were to do so, it would be contrary to Congressional intent to apply that revised definition to SHVA enforcement.

B. *Congress Did Not Intend the Commission to Alter the Very Limited Relief Provided to Satellite Operators in SHVA.*

In its *Notice*, the Commission acknowledges that SHVA constituted a "limited exception" to the exclusive copyright held by television networks and their affiliates to transmit programming to viewers. *Notice* at para. 2. However, EchoStar and NRTC

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<sup>4</sup> H.R. Rep. No. 887, Part 2, 100th Cong., 2d Sess. 26 (1988) (hereinafter, "*House Report II*") (emphasis added).

are asking the Commission to ignore the limited nature of the relief that Congress intended to provide to satellite operators in SHVA. Congress' intent to limit that relief is first demonstrated by the language of the Act itself, which defines an "unserved household" as one that cannot receive an affiliate's Grade B signal using an outdoor rooftop antenna, instead of a Grade A signal, or a signal measured indoors.

Congressional intent to limit the relief granted to satellite operators is made even more explicit in the legislative history of the Act:

The special statutory copyright for satellite service was created in recognition of the fact that a *small percentage* of television households cannot now receive a clear signal of the three national television networks.<sup>5</sup>

Furthermore, Congress' intent that the impact of SHVA be very limited was based in part on representations by the satellite carriers that the need for relief was very limited, noting that the carriers "all agree that approximately 1 percent or approximately 1 million is the figure" for white area ("unserved") households.<sup>6</sup> Indeed, at that time, the Commission itself reached a similar conclusion on this issue. In Re Inquiry into the Scrambling of Satellite Television Signals and Access to Those Signals by Owners of Home Satellite Dish Antennas, Second Report and Order, 3 FCC Rcd 1202, 1209

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<sup>5</sup> H.R. Rep. No. 887, Part 1, 100th Cong., 2d Sess. (hereinafter "*House Report I*") at 15 (emphasis added). Indeed, Congress' decision not to modify the definition of unserved household in its 1994 revision of SHVA, further demonstrates Congress' intent that the scope of SHVA be limited.

<sup>6</sup> Satellite Home Viewer Copyright Act: Hearings on H.R. 2848 Before the Subcommittee on Courts, Civil Liberties and the Administration of Justice, 100th Cong., Serial No. 89, at page 289 (Testimony of Brian J. McCauley, President, Netlink USA).



(1988)(stating only “800,000 to 1 million households” are unable to receive the over-the-air signal of local network affiliates).

Nevertheless, EchoStar and NRTC now ask the Commission to ignore Congressional intent, the contemporaneous representations made by satellite operators to Congress, and the Commission’s own findings, by redefining the signal intensity level and methodologies for measuring Grade B, in a manner designed to massively increase the area defined as “unserved”, and massively increase the number of viewers to whom the satellite operators may deliver network signals. But neither EchoStar nor NRTC have made any showing demonstrating that the facts regarding the ability of viewers to pick up Grade B over-the-air signals has changed since 1988, that would justify ignoring the obvious Congressional intent that SHVA apply to only a very limited number of viewers. Accordingly, the Commission cannot ignore the plain language of the Act, or Congress’ express intent, by enacting the NRTC/EchoStar proposals. Such action is unauthorized and will certainly lead to reversal by a federal appellate court.

C. *The EchoStar/NRTC Proposal is Extraordinarily Extreme, Reducing the Area of a Station’s Exclusivity Rights by Up to 97 Percent, and Reducing the Population Covered by the Station’s Rights by Up to 72 Percent.*

In light of the fact that the Commission appears to lack the authority to revise the definition of Grade B signal intensity for SHVA, and the fact that Congress obviously intended that SHVA apply only to a very limited number of viewers, the EchoStar/NRTC proposals are extraordinarily extreme: as shown in the coverage maps attached hereto in Exhibit B,<sup>7</sup> the EchoStar proposal would reduce the size of a station’s exclusivity area

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<sup>7</sup> Exhibit B contains coverage maps for NMBA Stations KOAT, Albuquerque; KOB-TV, Albuquerque; KRQE, Albuquerque; KOCT, Carlsbad, KVIH,

by up to 97 percent, and reduce the population covered by an affiliate's exclusivity rights by up to 72 percent! Even if the Commission had authority to make modifications to the Grade B definition for the purposes of SHVA (a point which NMBA does not concede), clearly such a modification goes way beyond the level of reasonableness.

The materials in Exhibit B were produced by Techware, Inc. of Chantilly, Virginia. For each station two studies were performed. The first study was conducted to determine the station's service area based on the current Grade B field intensity value, using the Longley-Rice propagation model, and the normal statistical values for Location Variability (50%), Time Variability (50%) and Confidence (50%). The second study was performed to determine the station's "Grade B" service based on the method proposed by EchoStar, using the statistical values proposed by EchoStar for Location Variability (99%), Time Variability (99%) and Confidence (99%). In addition, each study also includes an evaluation of Grade A field intensity service areas. A summary sheet is provided for each station showing the population and area of service for each of two studies for both Grade B and Grade A service.

In addition to the summary sheet, a graphical representation on a map is provided. Each plot shows the areas of Grade A and Grade B service. Areas where the predicted field intensity is equal to or greater than Grade A are depicted in red.

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Clovis; KOBF, Farmington; KBIM, Roswell; KOBK, Roswell; KASA, Santa Fe; and KOVT, Silver City.

Locations where the field is equal to or greater than Grade B and less than Grade A are shown in green.<sup>8</sup>

The results demonstrated in the maps are dramatic and devastating. For example, for Station KOAT, Albuquerque, the EchoStar proposal would reduce the size of the Station's exclusivity area by 97 percent, and reduce the population covered by that station's exclusivity rights by 72 percent.<sup>9</sup> Rule revisions that would produce such extreme results cannot rationally be considered consistent with Congress' intent that the copyright granted to satellite carriers under SHVA be limited to a "small percentage" of viewers.

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<sup>8</sup> The locations where the service prediction appears to end prematurely are the points where the evaluation boundary was reached. In order to show that, using the Longley-Rice method, Grade B field values are sometimes predicted beyond the traditional Grade B contour, the boundary of the area of evaluation was at least 25% beyond the predicted Grade B contour that does not use the Longley-Rice method. Indeed, these results demonstrate that many locations outside of a station's predicted Grade B contour are in fact served by that station with an actual Grade B signal. SHVA's requirement that "unserved households" be identified with actual measurements wisely recognizes this fact.

<sup>9</sup> The figures for the other NMBA network affiliate stations are as follows:

KOB population would be reduced 34.39%, KOB area would be reduced 95.19%;  
KOBF population would be reduced 45.79%, KOBF area would be reduced 90.55%;  
KOBK population would be reduced 99.36%, KOBK area would be reduced 88.44%;  
KOAT population would be reduced 72.08%, KOAT area would be reduced 97.97%;  
KVIH population would be reduced 39.09%, KVIH area would be reduced 86.07%;  
KOCT population would be reduced 71.75%, KOCT area would be reduced 84.54%;  
KOVN population would be reduced 93.42%, KOVN area would be reduced 99.05%;  
KRQE population would be reduced 53.21%, KRQE area would be reduced 97.31%;  
KBIM population would be reduced 92.29%, KBIM area would be reduced 86.79%;  
KASA population would be reduced 34.89%, KASA area would be reduced 95.14%.

**III. Reduction of the Area of an Affiliate's Exclusive Rights Will Result in Significant Lost Revenues for Stations, Which Will Impact Their Ability to Provide Free Local Over-the-Air Service, Including Extensive Translator Service For Low Income Rural Viewers.**

In enacting SHVA, Congress crafted a delicate balance between enhancing the delivery of network signals to a small number of viewers who cannot receive such signals over-the-air, with the need to preserve localism and the traditional network/affiliate relationship:

"[T]he bill respects the network/affiliate relationship and promotes localism."<sup>10</sup>

"This television network-affiliate distribution system involves a unique combination of national and local elements, which has evolved over a period of decades. The network provides the advantages of program acquisition or production and the sale of advertising on a national scale, as well as the special advantages flowing from the fact that its service covers a wide range of programs throughout the day.... But while the network is typically the largest supplier of nationally produced programming for its affiliates, the affiliate also decides which network programs are locally broadcast; produces local news and other programs of special interest to its local audience, and creates an overall program schedule containing network, local and syndicated programming."<sup>11</sup>

"The Committee believes that this approach will satisfy the public interest in making available network programming in these (typically rural) areas, while also respecting the public interest in protecting the network-affiliate distribution system."<sup>12</sup>

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<sup>10</sup> *House Report (I)* at 14.

<sup>11</sup> *House Report (II)* at 20.

<sup>12</sup> *Id.*

"Free local over-the-air television stations continue to play an important role in providing the American people information and entertainment. The Committee is concerned that changes in technology, and accompanying changes in law and regulation, do not undermine the base of free local television service upon which the American people continue to rely."<sup>13</sup>

As shown in the maps attached hereto in Exhibit B, the EchoStar/NRTC proposals would largely eviscerate the area in which network affiliates can claim exclusive rights to exhibit network programming, and will result in loss of viewers for the affiliates, which will significantly impact the ability of affiliate stations to provide free, over-the-air local programming to the community. This would directly contradict Congress' intent in enacting SHVA.

If viewers are watching a satellite feed of network programming, then they will not be watching the affiliate's delivery of that programming. This would be a direct result of satellite delivery of network programming. An indirect loss of viewers due to satellite delivery of network programming results when viewers do not watch the affiliate feed of network programming and thus are not "led-in" to the other local and syndicated programming broadcast by the station, immediately following the network programming, or at other times.

It is no secret that loss of viewers will directly lead to loss of advertising revenues. The Commission itself has recognized, in a similar proceeding, that:

"[d]iversion imposes economic harm on local broadcasters.... A drop of even a single rating point may represent a loss of 1/3 to 1/2 of a broadcaster's potential audience. Audience

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<sup>13</sup> *House Report (I)* at 26.

diversion translates directly into lost revenue for local broadcasters."<sup>14</sup>

Diversion of viewers from local affiliates to satellite network feeds will lead to loss of revenues for affiliates for the following reasons:

- Advertising rates, and purchases, are directly related to station viewership figures. Loss of viewers directly translates into loss of advertising revenues.

- Many affiliates receive compensation directly from their network for the carriage of network programming. Such compensation is typically related to the affiliate's viewership figures.

- Financing from banks and other financial institutions to stations is usually based in part on the station's revenue flow. Reduced revenues often lead to less attractive financial terms in loans to stations, which further reduces station revenues.

In sum, loss of exclusivity results in loss of viewers, which results in loss of revenues. The last piece of the equation, however, is that significant loss of revenues will inevitably impair the ability of affiliates to provide free, over-the-air local programming to the community. The reduction in the provision of local service that follows a significant drop in affiliate revenues is not an easy or pleasant decision for stations; but it is a natural and predictable business decision to cut expenses when necessary.<sup>15</sup> The production of local news and public affairs programming requires out-of-pocket expenses for news sets, production facilities, mobile news vehicles, remote

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<sup>14</sup> Report and Order on Program Exclusivity, 3 FCC Rcd 5299 (1988) at para. 41.; *recon*, 4 FCC Rcd 2711 (1989); *aff'd sub nom.*, United Video, Inc. v. FCC, 890 F.2d 1173 (D.C.Cir. 1989).

<sup>15</sup> See, e.g., Dan Trigoboff, *News Not Paramount*, Broadcasting & Cable, December 7, 1998 at 30 (Noting that UPN affiliate KSTW, Seattle, just discontinued its local news broadcast, in part because of needs to reduce the Station's budget, and the lack of economies of scale from a single-hour news show.).

equipment, and reporters. To make matters worse, the reduction or elimination of local programming is more likely to occur in smaller markets where stations have less revenues than large market stations, and thus have less flexibility to absorb losses. These small markets typically have less stations providing local programming to start, so that the loss of even one local voice has a greater impact.

Equally significant in the State of New Mexico, would be the impact on the ability of affiliates to maintain and support the extensive network of translators that provides free over-the-air service to rural residents disbursed throughout the 160,000 square miles of New Mexico. Indeed, a large percent of these rural viewers are low income, and for these viewers, who cannot afford cable TV or satellite services, this translator service provides the only video service these viewers can receive. This is an issue of critical importance to rural Western states.

The costs of maintaining this translator network are substantial. As shown in Exhibit A, the ABC, CBS, NBC, Fox and UPN affiliates in the State operate and maintain 298 translator stations throughout the State.<sup>16</sup> One affiliate, KOB-TV, devotes almost 30 percent of its engineering staff resources, and 10 to 15 percent of its overall capital expenditures, to maintaining translators and satellite stations. While the operation of these translator stations serves a commercial purpose for the affiliates, in light of the low density of the population served by the translators, the expenses of

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<sup>16</sup> Some of these translator stations are licensed to the NMBA affiliate primary stations, and other translators are licensed to local translator associations, but those translators are maintained by the affiliates, who also provide financial assistance for utility bills, filing fees, the purchase of new equipment, etc.

these operations are among the first to be eliminated when a station's budget must be reduced due to reductions in revenue.

In sum, a substantial loss in an affiliate's area of exclusivity, as proposed by EchoStar and NRTC, will lead directly to loss of revenues, which will significantly impact the ability of affiliates to provide free over-the-air local programming. Such a result is directly contrary to Congressional intent in the enactment of SHVA. Furthermore, as shown below, such a result is directly contrary to the Commission's own policies on localism.

#### **IV. The Impact of the EchoStar/NRTC Proposals Would Be Inconsistent with the Commission's Own Localism Principles.**

In paragraph 15 of the *Notice*, the Commission "recognizes" the "important role that local broadcast stations play in their communities", but appears to view this as just one factor to balance against the desire to use SHVA enforcement to "promote competition among multichannel video programming distributors." Comments filed by other parties earlier in this proceeding have noted the inappropriateness of the Commission's attempt to use its limited role in a copyright matter to advance its own telecommunications policies, and the NMBA endorses that critique. But while the Commission further acknowledges, in paragraph 36 of the *Notice*, that "localism is central to [the Commission's] policies governing broadcasting...", the NMBA takes this opportunity to remind the Commission just how central the principle of localism was in shaping the cable TV network non-duplication rules, which cover issues very analogous to those in this proceeding.



When the Commission first instituted rules to give local broadcast stations the right to demand protection against importation of duplicating distant signals by cable TV operators, the Commission made it clear that the primary purpose of such rules was to prevent harm to local stations, noting that its "aim in this regard is not to take any programs away from any CATV subscriber, but to preserve to local stations the credit to which they are entitled - in the eyes of advertisers and the public - for presenting programs for which they had bargained and paid in the competitive market."<sup>17</sup> In a related proceeding at that time, the Commission noted that imported distant signals by cable TV operators "[do] not serve as an outlet for local self expression. It does not present local discussion, the local ministers or educators, the local political candidates, etc."<sup>18</sup>

The basic principles of localism have not changed since that time. Notwithstanding the growth of national cable programming channels, viewers still look to their local broadcast affiliates for local news and public affairs programming. On the evening of elections, the community looks to their local station to follow the results of local elections. The viewers in Farmington, New Mexico have over-the-air service from a few translators and only one full power television station licensed to their community: KOB, a satellite of Station KOB, Albuquerque. If satellite importation of a distant affiliate undercuts the ability of Station KOB to provide service to Farmington, what are

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<sup>17</sup> First Report and Order on Microwave Relays (Docket Nos. 14895 and 15233), 4 RR 2d 1725, 1761 (1965).

<sup>18</sup> Second Report and Order on CATV Regulation (Docket Nos. 14895, 15233, and 15971) 6 RR 2d. 1717, 1778 (1966).

the local viewers to do? Watch election results from a Chicago station? Will distant affiliates in North Carolina provide New Mexico viewers with information on issues of critical importance to New Mexico residents, a state which leads the nation in DWI arrests, infant mortality rate, and other measures of poverty? Probably not.

Furthermore, local programming from local stations not only informs viewers about social, political and economic matters that directly impact their communities, but helps to build strong communities. Broadcast stations use their facilities to promote local charitable and community service organizations, and sponsor local community service events, such as child vaccination programs, coat drives, etc. Announcements for a blood drive in Albuquerque will not be found on a distant signal originating in Denver.

The NMBA fears that in this proceeding, the Commission will cave in to temporary political pressure, and be seduced by attractive but specious claims about how satellite operators need to import distant signals in order to compete with local cable TV operators, with the result that the Commission makes a decision destructive to the principle and practice of broadcast localism. The Commission has made a notably similar mistake in the past, when it eliminated (in 1980) the syndicated exclusivity rules, in the name of promoting competition in the production and distribution of programming. In reinstituting the syndex rules in 1988, the Commission admitted that it had previously

*"failed to analyze the effects on the local television market of denying broadcasters the ability to enter into contracts with enforceable exclusive exhibition rights when they had to compete with cable operators who could enter into such contracts.... The incomplete 1980 analysis led the*

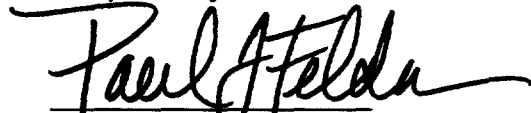
Commission to mischaracterize the role that exclusivity plays in the functioning of the local television market."<sup>19</sup>

The Commission should not feel compelled to repeat essentially the very same mistake.

#### **V. Conclusion**

SHVA froze the definition of Grade B signal intensity, for SHVA enforcement purposes, to the standards then in existence in 1988. However, even if the Commission did have the authority to modify those standards for SHVA purposes, any significant modification would reduce the viewers of network affiliate stations, reducing the revenues of those stations, and inevitably forcing those stations to reduce the provision of free over-the-air local programming. Such a result would be contrary to Congress' intent in enacting SHVA, and contrary to the Commission's own principles of localism. The Commission must reject, as unreasonable and beyond its authority, proposals to modify the Congressionally mandated definition of "unserved household".

Respectfully submitted,



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<sup>19</sup> Report and Order on Program Exclusivity, *supra* note 10, 3 FCC Rcd 5299 at para. 23 (emphasis in original).

## **Exhibit A**

### **New Mexico Network Affiliate Translators**

Map of New Mexico showing county boundaries and the distribution of four bird species: KOAT (black square), KOB (white triangle), KRQE (black circle), and KASA (black diamond). The map includes labels for neighboring states (ARIZONA, TEXAS, OKLAHOMA, COLORADO) and various counties (e.g., APACHE, SAN JUAN, SANTA FE, BERNALILLO, SANTIAGO, etc.). Major cities and towns are marked with dots. The distribution of KOAT is widespread across most counties. KOB is found in the northern and central regions. KRQE is concentrated in the southern and central regions. KASA is found in the northern and central regions.

# New Mexico Broadcasters - Translator Carriage

Site Location

Primary

Translator

## Abiquiu NM

KOAT	Abiquiu Valley TV Assoc	<b>K11MH</b>
KOB	Abiquiu Rural	<b>K09LY</b>
KRQE	New Mexico Broadcasting Inc.	<b>K06ME</b>

## Alamogordo NM

KASA	KASA-TV, Inc (formerly Journal Broadcasting, Former KGSW)	<b>K53BM</b>
KASY	New Mexico Broadcasting Inc.	<b>K65CG</b>
KBIM	New Mexico Broadcasting Inc.	<b>K59AB</b>
KOAT	Pulitzer Broadcasting Company	<b>K34CR</b>
KOBR	Alamogordo Evening Lions Club	<b>K69AC</b>

## Alamosa CO

KASA	San Luis Valley TV	<b>K61AZ</b>
KOAT	San Luis Valley TV	<b>K65AS</b>
KOB	San Luis Valley TV	<b>K63AN</b>
KRQE	New Mexico Broadcasting Inc.	<b>K67AK</b>

## Albuquerque NM

(Santa Fe)

(Santa Fe)

KASA	KASA-TV, Inc.	ntsc 2
KASA	KASA-TV, Inc.	dtv 27
KASY	RayMar Broadcasting	ntsc 50
KASY	RayMar Broadcasting	dtv 51
KOAT	Pulitzer Broadcasting Company	ntsc 7
KOAT	Pulitzer Broadcasting Company	dtv 21
KOB	KOB-TV, Inc	ntsc 4
KOB	KOB-TV, Inc	dtv 26
KRQE	New Mexico Broadcasting Inc.	ntsc 13
KRQE	New Mexico Broadcasting Inc.	dtv 16

## Allison, CO

KOAT	Allison TV Assn.	<b>K02HM</b>
KOB	Allison TV Assn.	<b>K11BA</b>
KRQE	New Mexico Broadcasting Inc.	<b>K09GH</b>

## Alma NM

KOAT	Glenwood TV Club	<b>K02DE</b>
KRQE	New Mexico Broadcasting Inc.	<b>K05JB</b>

## Amalia

KOAT	Amalia TV Translator Assoc	<b>K10JL</b>
KOB	Amalia TV Translator Club	<b>K08MI</b>
KRQE	New Mexico Broadcasting Inc.	<b>K12KB</b>

## Artesia

KASA	KASA-TV, Inc.	<b>K40ET</b>
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# New Mexico Broadcasters - Translator Carriage

Site Location  
**Apache Springs NM**

Primary

Translator

KRQE	New Mexico Broadcasting Inc.	WPNB264
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## Aztec

KOAT	Pulitzer Broadcasting Company	K10CG
KRQE	New Mexico Broadcasting Inc.	K08FR

**Bayfield, CO**  
(Ignacio CO)

KASA	KASA-TV, Inc	K63BN
KOAT	Pine River TV Association	K67CN
KOBF	Pine River TV Association	K65CF
KRQE	New Mexico Broadcasting Inc.	K08ET
KRQE	New Mexico Broadcasting Inc.	K42DI

## Black Lake

KOB	KOB-TV, Inc.	K06JO
KRQE	New Mexico Broadcasting Inc.	K08LA

**Blanco**  
Bloomfield

KOAT	Pulitzer Broadcasting Company (Huerfano Mesa)	K62CR
KOAT	Pulitzer Broadcasting Company	K09JJ
KOB	KOB-TV, Inc. (Huerfano Mesa)	K57EB
KOB	San Juan Non-Profit TV	K07TY
KRQE	New Mexico Broadcasting Inc.	K11JO

## Buena Vista

KOAT	Buena Vista TV Translator Group	K12LQ
KOB	Buena Vista TV Translator Group	K10LE

## Caballo Mtn

KASA	KASA-TV, Inc.	K31DR
KOAT	Pulitzer Broadcasting Company	K49CZ
KRQE	New Mexico Broadcasting Inc.	K67BG

## Capulin

KOAT	Sierra Grande TV Cooperative (Des Moines)	K62AR
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## Capitan

KOAT	Pulitzer Broadcasting Company (Ruidoso)	K58AH
KASA	KASA-TV, Inc (Ruidoso)	K55AC

## Carlsbad NM

KASA	KASA-TV, Inc.	K31BX
KOB	KOB-TV, Inc	K57FI

# New Mexico Broadcasters - Translator Carriage

Site Location  
Carrizozo NM

Primary

Translator

(Chupadera Mesa)

KASA	KASA-TV, Inc	WPNM872
KOAT	Pulitzer Broadcasting Company	K43BT
KOB	KOB-TV, Inc	K31CN
KRQE	New Mexico Broadcasting Inc. (Mescalero)	K11OD
KRQE	New Mexico Broadcasting Inc.	K57CF

Cebolla NM

KOAT	Cebolla TV Booster Association	K61FA
KOB	Cebolla TV Booster Association	K56EH

Cedar Canyon NM

KOB	KOB-TV, Inc	K67BD
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Chama NM

(Tierra Amarilla)  
(Brazos)

KOAT	Pulitzer Broadcasting Company (Tierra Amarilla)	K60DD
KOB	KOB-TV, Inc	K09KJ
KRQE	New Mexico Broadcasting Inc.	K44DD

Chinle, AZ

KOAT	Pulitzer Broadcasting Company	K10IN
KOB	KOB-TV, Inc.	K08HO
KRQE	New Mexico Broadcasting Inc.	K13VW

Chromo, CO

KOAT	Chromo TV Assn.	K02EA
KRQE	New Mexico Broadcasting Inc.	K12HS

Cliff

KOAT	Cliff-Gila TV Club	K09IG
KRQE	New Mexico Broadcasting Inc.	K07AS
KOB	TV Assoc	K09IG

Clovis

KOB	Clovis Evening Lions Club	K55AM
KRQE	New Mexico Broadcasting Inc.	K49BY

Colfax

KASA	KASA-TV, Inc (Green Mt)	K40DI
KOAT	Pulitzer Broadcasting Company (Green Mt)	K66AE
KOB	KOB-TV, Inc (Eagle Nest)	K57AS
KRQE	New Mexico Broadcasting Inc.	K69AE

Columbine Park

KOAT	Molybdenum Corp.	K11GU
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Conchas

KASA	Conchas Dam TV Assn.	K16DN
KOB	Conchas Dam TV Assn.	K09IA
KRQE	New Mexico Broadcasting Inc.	K06JB
KOAT	Conchas Dam TV Assn.	K11JD



# New Mexico Broadcasters - Translator Carriage

Site Location  
Cortez CO

Primary

Translator

KASA	SW County Translator Association	K51DB
KOAT	Montezuma/Dolores County	K09DM
KOB	SW County Translator Association	K11LP
KOB	KOB-TV, Inc	K53DR
KRQE	New Mexico Broadcasting Inc.	K06JF
KRQE	SW County Translator Association	K07UY
KRQE	SW County Translator Association	K33AE

## Coyote

## Creede

KOAT	Coyote TV Translator Co.	K11NY
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## Crownpoint NM

KOAT	Creede TV Assn	K11LR
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KOAT	Pulitzer Broadcasting Company	K65FJ
KOBF	KOB-TV, Inc	K63EQ
KRQE	New Mexico Broadcasting Inc.	K67FP

## Del Norte

KASA	KASA-TV, Inc	K06KB
KOAT	Parker Hill TV Assn.	K13CB
KOB	KOB-TV, Inc	K07KB

## Deming NM

KASA	KASA-TV, Inc.	K60EH
KOAT	Pulitzer Broadcasting Company	K51DS
KOB	KOB-TV, Inc	K68DX
KRQE	New Mexico Broadcasting Inc.	K57AW

## Des Moines NM

KOAT	Sierra Grande TV Cooperative (Capulin)	K62AR
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## Dolores, CO

KASA	Montezuma/Dolores County	K04NK
KOAT	Montezuma/Dolores County	K04NK

## Dora NM

KBIM	New Mexico Broadcasting	K69CQ
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## Dove Creek, CO

KOAT	Montezuma Delores County	K05EW
KOB	Montezuma Delores County	K02MF

# New Mexico Broadcasters - Translator Carriage

Site Location

Primary

Translator

## Dulce NM

KASA	Navajo Translator	36STA
KOAT	Pulitzer Broadcasting Company	K28ER
KOBF	KOB-TV, Inc	K20EK
KRQE	New Mexico Broadcasting Inc.	K26ET

## Durango CO

KASA	KASA-TV, Inc.	K39AH
KOAT	Pulitzer Broadcasting Company	K45DH
KOB	KOB-TV, Inc	K72AN
KOBF	KOB-TV, Inc	K66BN
KREZ	New Mexico Broadcasting Inc.	K68AZ

## Dyke, CO

KOB	TV Assoc.	K29CA
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## Eagle Nest Baldy NM

(Baldy)

KASA	Eagle Nest TV Association	K53ET
KOAT	Eagle Nest TV Association	K09AK
KOB	Eagle Nest TV Association	K48AX
KRQE	New Mexico Broadcasting Inc.	K35BZ

## Eagle Tail NM

KASA	KASA-TV, Inc.	K40DI
KOAT	Pulitzer Broadcasting Company (Raton)	K16CH
KOB	KOB-TV, Inc (Raton)	K26DX
KRQE	New Mexico Broadcasting Inc.	K52DL

## El Morro

KOAT	Ramah TV Assoc.	K09KB
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## Espanola

KASA	KASA-TV, Inc	K39EJ
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## Farley, NM

KOB	Farley TV Club	K11CL
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## Farmington NM

KASA	KASA-TV, Inc.	K55DW
KASY	New Mexico Broadcasting Inc.	K23BT
KOAT	Pulitzer Broadcasting Company	K19CM
KOBF	KOB-TV, Inc	12
KRQE	New Mexico Broadcasting Inc.	K21AX

## Forest NM

KOAT	Pulitzer Broadcasting Company	K52CR
KOB	Clovis Evening Lion's Club	K61AF

# New Mexico Broadcasters - Translator Carriage

Site Location  
**Fort Sumner**

Primary

Translator

KOAT	Fort Sumner Chamber of Commerce	K13IL
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## Gallina NM

KNME	Gallina Translator Association	K63BU
KOAT	Gallina Translator Association	K65CF
KOB	Gallina Translator Association	K61BC
KRQE	Gallina Translator Association	K67CE

## Gallup NM

KOAT	Pulitzer Broadcasting Company	K08IJ
KOAT	City of Gallup	K67BP
KOB	KOB-TV, Inc	K65BH
KOBF	KOB-TV, Inc (Tohatchi)	K06IS
KRQE	New Mexico Broadcasting Inc.	K69BW
		K10IR

## Ganado, AZ

KOAT	Ganado Community TV	K09IO
KOB	Ganado Community TV	K09WN
KOB	Ganado Community TV	K07PK

## Grants NM

KASA	KASA-TV, Inc.	K20FB
KOAT	Pulitzer Broadcasting Company	K11EV
KOB	KOB-TV, Inc	K06CU
KRQE	New Mexico Broadcasting Inc.	K09EP

## Greasewood, AZ

KOAT	Greasewood Community Club	K12IO
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## Green Mountain NM

KASA	KASA-TV, Inc (Colfax)	K40DI
KOAT	Pulitzer Broadcasting Company (Colfax)	K66AE
KOB	KOB-TV, Inc (Colfax)	K57AB
KRQE	New Mexico Broadcasting Inc.	K38EC

## Guadalupita

KOB	Guadalupita Television Association	K09LQ
KRQE	New Mexico Broadcasting Inc	K11NV

## Hatch      **see Caballo**

## Hermosa

KASA	KASA-TV, Inc	WPND871
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## Hillsboro

KOAT	Hillsboro TV Assoc	K08LP
KRQE	New Mexico Broadcasting Inc	K11HB

# New Mexico Broadcasters - Translator Carriage

Site Location

## Hobbs NM

Primary	Translator
KASA	KASA-TV, Inc
KOAT	Pulitzer Broadcasting Company
KOAT	Pulitzer Broadcasting Company

## Horse Springs NM

KOAT	Pulitzer Broadcasting Company
KOB	KOB-TV, Inc

## Huerfano Mesa NM

KOAT	Pulitzer Broadcasting Company (Blanco)
KOB	KOB-TV, Inc (Blanco)
KOB	KOB-TV, Inc
KRQE	New Mexico Broadcasting Inc.

## Jack's Peak NM

KOAT	Pulitzer Broadcasting Company
KOB	KOB-TV, Inc
KRQE	New Mexico Broadcasting Inc.

## Keyente, AZ

KOAT	Kayenta TV Assn.
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## Klegetoh AZ

KOB	KOB-TV, Inc (Navajo Compressor)
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## Las Cruces, NM

KOB	KOB-TV, Inc
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## Las Vegas NM

KASA	KASA-TV, Inc.
KOAT	Pulitzer Broadcasting Company
KOB	KOB-TV, Inc
KRQE	New Mexico Broadcasting Inc.
KRQE	New Mexico Broadcasting Inc.

## Lordsburg NM

KASA	KASA-TV, Inc.
KOB	KOB-TV, Inc
KRQE	New Mexico Broadcasting Inc.

## Lovington NM

KASA	KASA-TV, Inc
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## Many Farms AZ

### Roof Butte

KASA	KASA-TV, Inc
KOAT	Pulitzer Broadcasting Company
KOBF	KOB-TV, Inc
KREZ	New Mexico Broadcasting Inc.

## Masonic Park, CO

KOAT	South Fork TV Assn.
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## New Mexico Broadcasters - Translator Carriage

Site Location

Primary

Translator

### Maxwell NM

KOB	KOB-TV, Inc	K10BQ
KRQE	New Mexico Broadcasting Inc.	K06DB

### Mescalero

KASA	KASA-TV, Inc.	K44EI
KOAT	Apache Tribe of Mescalero	K08IX
KOAT	Apache Tribe of Mescalero	K10KJ
KOB	Apache Tribe	K06EV
KRQE	New Mexico Broadcasting Inc.	K12KU

### Montoya/Newkirk

KASA	KASA-TV, Inc.	K22EU
KOAT	Pulitzer Broadcasting Company	K57BR
KOB	KOB-TV, Inc	K06CV

### Mora

KASA	KASA-TV, Inc.	K06HX
KRQE	New Mexico Broadcasting Inc.	K22EW
KOAT	Pulitzer Broadcasting Company	K11IK
KOB	Mora TV Assoc.	K09DZ
KOB	Mora TV Assoc.	K25FI

### Mud Canyon

KRQE	New Mexico Broadcasting Inc.	K13OX
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### Navajo

KOAT	Navajo Tribe	K07GR
KRQE	New Mexico Broadcasting Inc.	K13GX

### Navajo Compressor Station AZ

KOAT	El Paso Natural Gas	K64AY
KOB	KOB-TV, Inc (Klegetoh, Az)	K68BL
KRQE	New Mexico Broadcasting Inc.	K66BH

### Pagosa Springs CO

(Putt Hill)

KASA	KASA-TV, Inc	WPND869
KOAT	Pulitzer Broadcasting Company	K10GO
KOAT	Pulitzer Broadcasting Company	K58CJ
KOB	Pagosa Springs TV Assoc.	K08GM
KOB	Pagosa Springs TV Assoc.	K54DH
KOB	Pagosa Springs TV Assoc.	K09JV
KRQE	New Mexico Broadcasting Inc.	K04NS
KRQE	New Mexico Broadcasting Inc.	K56DO

### Penasco

KOAT	Penasco Social Action Committee	K11IZ
KRQE	New Mexico Broadcasting Inc.	K09IU
KOB	Penasco Social Action Committee	K06FT

# New Mexico Broadcasters - Translator Carriage

Site Location

Primary

Translator

## Portales NM

KASA	KASA-TV, Inc	K64FB
KOAT	Pulitzer Broadcasting Company	K62EX

## Quemado

KOAT	Quemado TV Assn	K11JT
KOB	Quemado TV Assn	K09JL
KRQE	New Mexico Broadcasting Inc.	K06KP

## Questa

KOAT	Molycorp, Inc	K11GU
KOB	KOB-TV, Inc	K09CR

## Ramah

KOAT	Ramah TV Assoc.	K07JQ
KOB	Ramah Navajo School	K11JF

## Raton

KASA	KASA-TV, Inc (Green Mt.)	K40DI
KOAT	Pulitzer Broadcasting Company (Eagle Tail)	K16CH
KOB	KOB-TV, Inc. (Eagle Tail)	K26DK

## Red River

KOAT	Community TV Association Cooperative	K12OC
KOB	Community TV Assoc	K06FZ
KRQE	New Mexico Broadcasting Inc.	K08ES

## Rico

KRQE	New Mexico Broadcasting Inc.	K09KL
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## Roswell NM

KASA	KASA-TV, Inc.	K56CZ
KOAT	Pulitzer Broadcasting Company	K13RK
KOAT	Pulitzer Broadcasting Company	K62AL
KOBR	KOB-TV, Inc	3

## Roy NM

KOAT	Pulitzer Broadcasting Company	K09AW
KOB	Roy TV, Club	K06EM
KRQE	New Mexico Broadcasting Inc.	K11AW

## Ruidoso NM (Buck Mnt.)

KASA	KASA-TV, Inc.	K55AC
KBIM	New Mexico Broadcasting Inc.	K16BZ
KOAT	Pulitzer Broadcasting Company (Capitan)	K58AH
KOB	KOB-TV, Inc	K53BN
KOB	KOB-TV, Inc	K64AS

## Sanders, AZ

KOAT	Puerco Valley TV Assn	K11OZ
KRQE	New Mexico Broadcasting Inc.	K13KT

## San Luis and Rural

KOAT	Costilla County TV Booster Assn	K11GW
KOB	Castilla County Commission	K06BE

## San Mateo

KOB	TV Assoc	K09VG
KRQE	New Mexico Broadcasting Inc.	K06MG

# New Mexico Broadcasters - Translator Carriage

Site Location  
Santa Rosa NM

Primary

Translator

KOAT	Santa Rosa Chamber of Commerce	K64DV
KOB	Santa Rosa Chamber of Commerce	K36DI
KOB	Santa Rosa Chamber of Commerce	K09KC
KRQE	New Mexico Broadcasting Inc.	K62CU

Romeo CO    see Alamosa CO

Shiprock AZ

KOAT	Shiprock Non-Profit TV Assoc	K11CF
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Silver City NM

KOB	KOB-TV, Inc	K06EH
KRQE	New Mexico Broadcasting Inc.	K45EC

Socorro NM

KOB	KOB-TV, Inc	K11MC
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Sunetha CO

KOAT	Pagosa Springs TV Assn.	K80AV
KRQE	New Mexico Broadcasting Inc.	K66AV

Taos

KOAT	Taos Community TV Inc	K33BN
KOAT	Pulitzer Broadcasting Company	K08KX
KOB	KOB-TV, Inc	K06LS
KRQE	New Mexico Broadcasting Inc.	K09EQ

Thoreau NM

KOAT	Pulitzer Broadcasting Company	K57AL
KOB	KOB-TV, Inc	K55BP
KRQE	New Mexico Broadcasting Inc.	K59BH

Tierra Amarilla

KOAT	Pulitzer Broadcasting Company (Chama)	K60DD
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Tohachi NM

KASA	KASA-TV, Inc.	K18CX
KOAT	El Paso Natural Gas	K64BM
KOB	KOB-TV, Inc (Gallup)	K06IS
KRQE	New Mexico Broadcasting Inc.	K66AN
KRQE	New Mexico Broadcasting Inc.	K68BX
KRQE	New Mexico Broadcasting Inc.	K47DI

Towaoc

KOAT	Ute Mountain Ute Tribe	K02BH
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Truth or Consequences NM

KASA	City of Truth or Consequences	K27BN
KOAT	City of Truth or Consequences	K64CG
KOB	KOB-TV, Inc	K51BQ
KRQE	New Mexico Broadcasting Inc.	K54CC

## New Mexico Broadcasters - Translator Carriage

Site Location

Primary

Translator

### Tucumcari NM

KASA	KASA-TV, Inc.	K48EH
KOAT	UHF TV Assoc	K42CR
KOB	UHF TV Assoc	K67AI
KRQE	New Mexico Broadcasting Inc.	K44CJ

### Upper Piedra, CO

KOAT	Upper Piedra TV Assn.	K02HX
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### Ute Park

KOAT	Ute Park TV Assn	K02EH
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### Vallecito Reservoir

KOAT	Lake TV Assn	K02ET
KOB	Lake TV Assn	K10AD

### Vermejo Park

KOAT	Vermejo Park Corp	K11JB
KRQE	New Mexico Broadcasting Inc	K09IY

### Wagon Mound NM

KOAT	Wagon Mound TV Club	K11MD
KOB	Wagon Mount TV Club	K09CR
KRQE	New Mexico Broadcasting Inc.	K06BN

### Window Rock AZ.

KOAT	Navajo Tribal Council	K67BQ
KOB	KOB-TV, Inc	K65BI
KRQE	New Mexico Broadcasting Inc.	K69BV

### Zuni

KOAT	Zuni Communications Authority	K09FR
KOB	KOB-TV, Inc	K16DL
KRQE	New Mexico Broadcasting Inc.	K02EY

## 298 Total Translators in Albuquerque/Santa FE DMA

(Carrying signals from DMA or adjacent DMA Stations)

(Does not account for all Translator Relays)



## **Exhibit B**

### **Service Analysis for SHVA Proceeding**

**KOAT Channel 7 Albuquerque, New Mexico**

**Longley-Rice Analysis**

SERVICE	F(50/50/50) (Grade B)		F(50/50/50) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	764,256	49,040	716,413	34,890

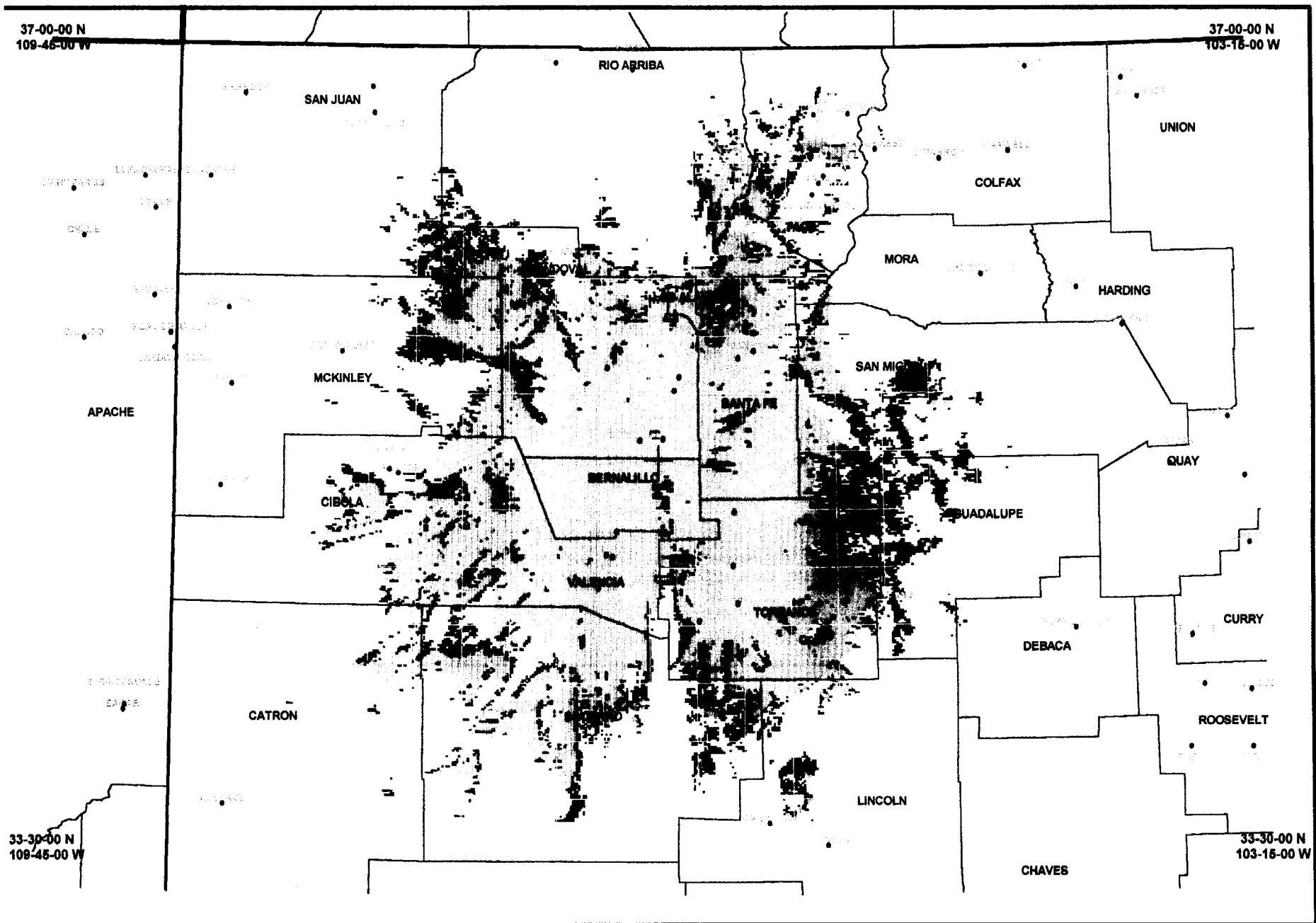
	F(99/99/99) (Grade B)		F(99/99/99) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	213,323	994	166	54

F(50/50/50) - Longley-Rice Location Variability (50%), Time Variability(50%), Confidence (50%)

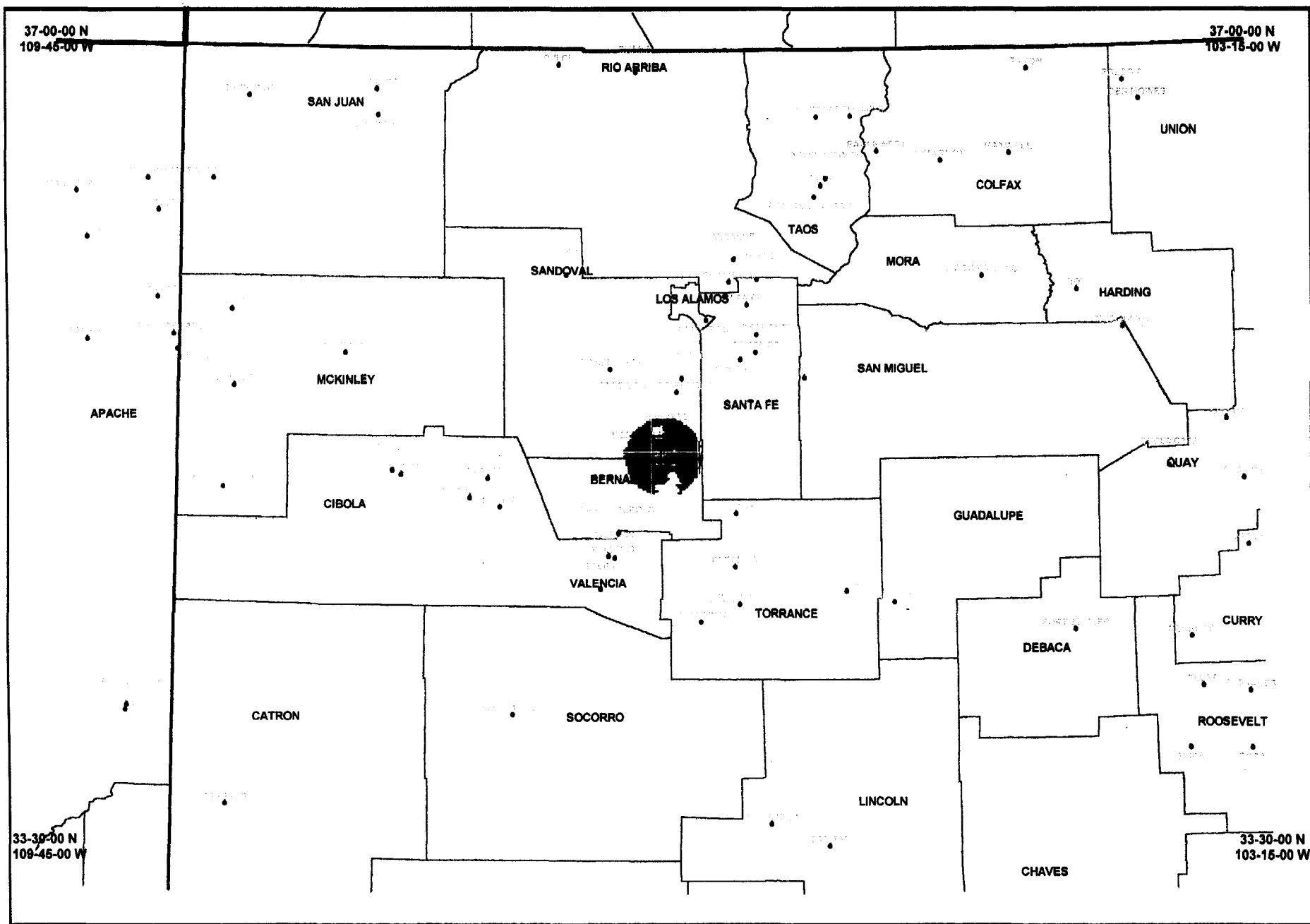
F(99/99/99) - Longley-Rice Location Variability (99%), Time Variability(99%), Confidence (99%)

Prepared for: **New Mexico Broadcasters** December 1, 1998

Prepared by: **TechWare, Inc.**  
**Suite 206**  
**14101 Parke Long Court**  
**Chantilly, VA 20151**  
**703-222-5842**



**KOAT ALBUQUERQUE NM NTSC Channel 7**  
**Grade B = Green Grade A = Red**  
**Longley-Rice Analysis**  
**L = 50%, T = 50%, C = 50%**  
**Prepared for New Mexico Broadcasters**  
**Prepared by TechWare, Inc. Chantilly, VA 703-222-5842**



KOAT ALBUQUERQUE NM NTSC Channel 7

Grade B = Green Grade A = Red

Longley-Rice Analysis

L = 99%, T = 99%, C = 99%

Prepared for New Mexico Broadcasters

Prepared by TechWare, Inc. Chantilly, VA 703-222-5842

**KOB Channel 4 Albuquerque, New Mexico**

**Longley-Rice Analysis**

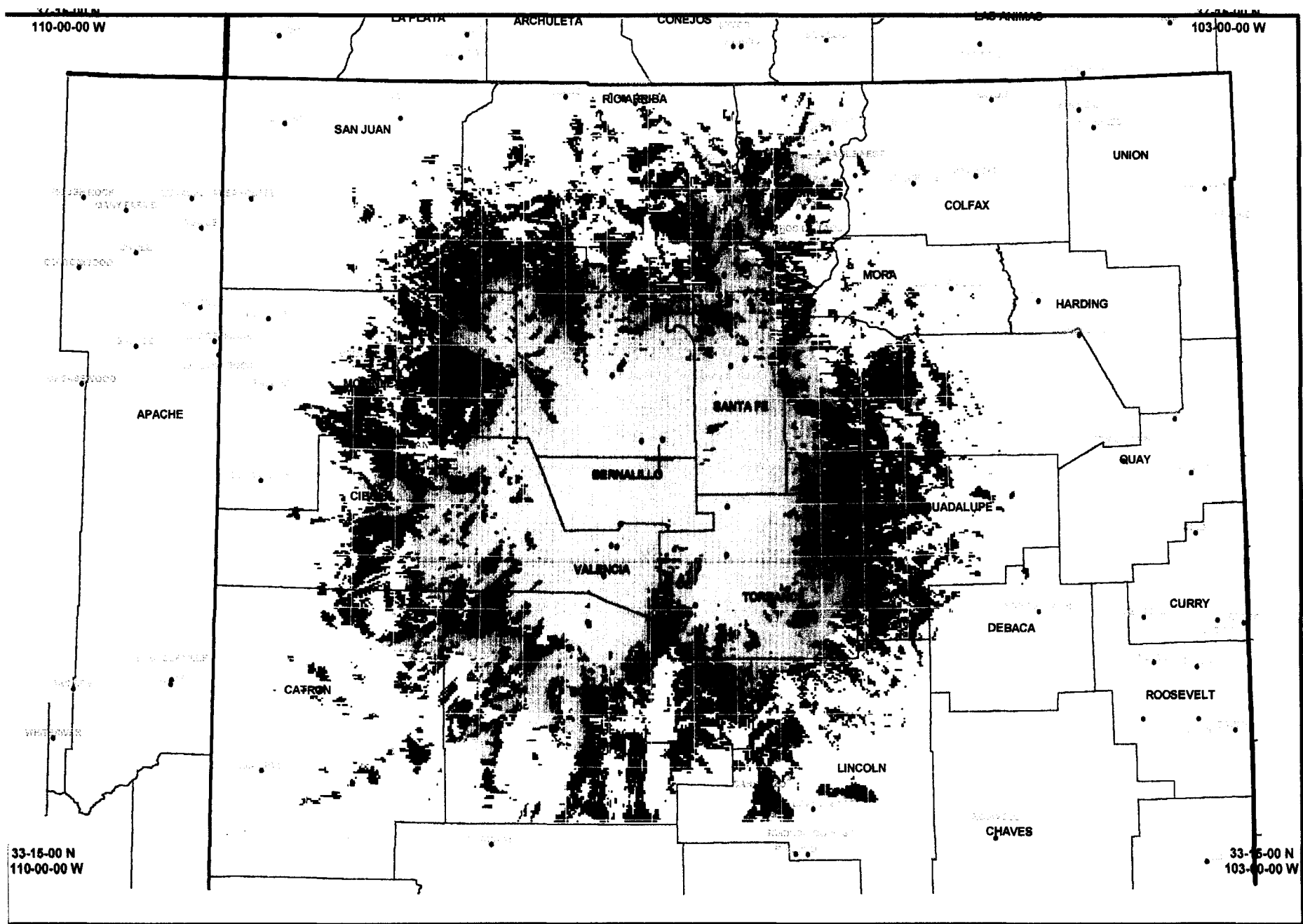
<b>SERVICE</b>	<b>F(50/50/50) (Grade B)</b>		<b>F(50/50/50) (Grade A)</b>	
	<b>Population</b>	<b>Area (Square km)</b>	<b>Population</b>	<b>Area (Square km)</b>
<b>Limited by Terrain</b>	<b>805,374</b>	<b>75,537</b>	<b>731,281</b>	<b>36,311</b>
	<b>F(99/99/99) (Grade B)</b>		<b>F(99/99/99) (Grade A)</b>	
	<b>Population</b>	<b>Area (Square km)</b>	<b>Population</b>	<b>Area (Square km)</b>
<b>Limited by Terrain</b>	<b>528,345</b>	<b>3,629</b>	<b>570</b>	<b>58</b>

**F(50/50/50) - Longley-Rice Location Variability (50%), Time Variability(50%), Confidence (50%)**

**F(99/99/99) - Longley-Rice Location Variability (99%), Time Variability(99%), Confidence (99%)**

**Prepared for: New Mexico Broadcasters December 1, 1998**

**Prepared by: TechWare, Inc.  
Suite 206  
14101 Parke Long Court  
Chantilly, VA 20151  
703-222-5842**



KOB ALBUQUERQUE NM NTSC Channel 4

Grade B = Green Grade A = Red

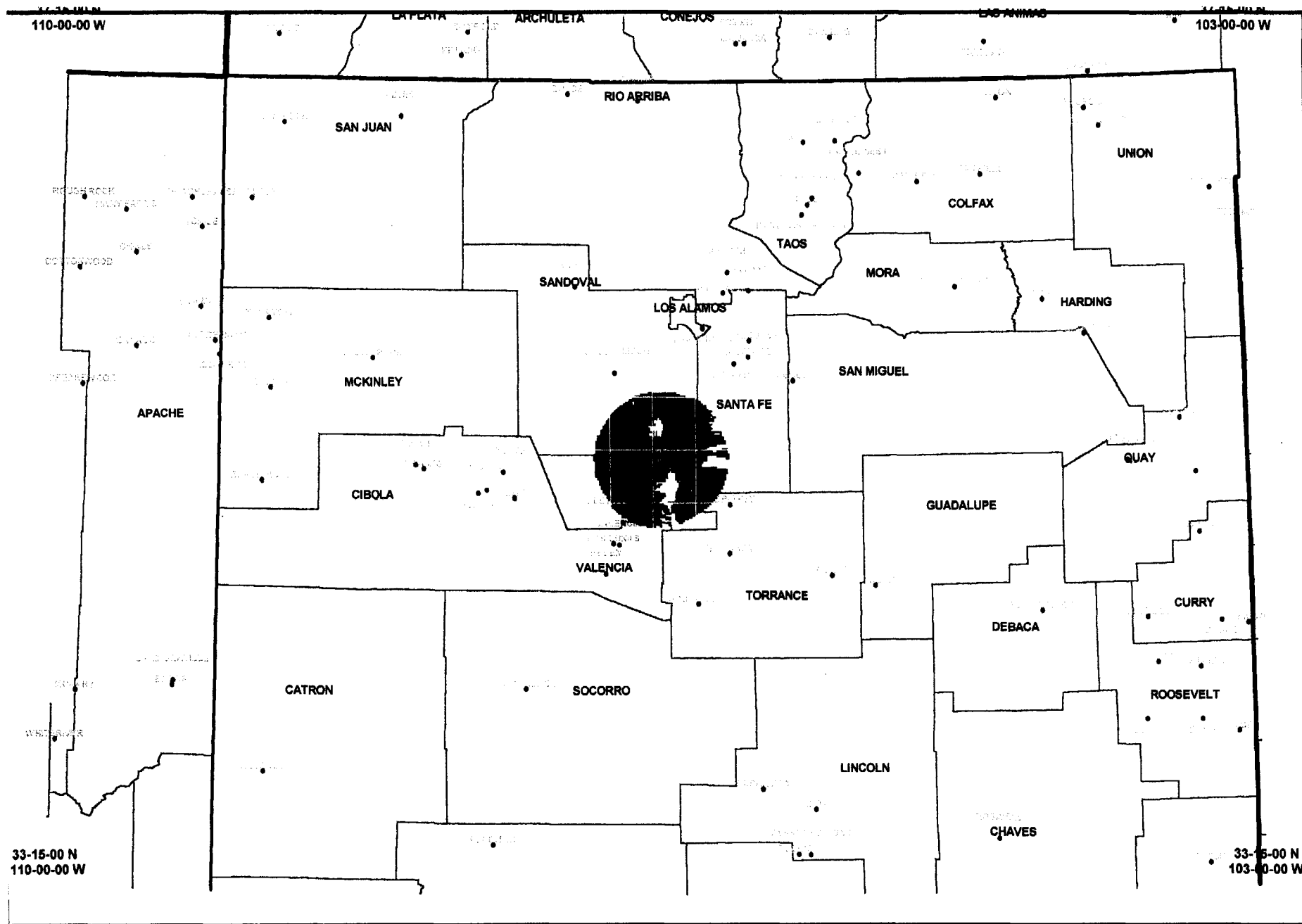
Longley-Rice Analysis

L = 50%, T = 50%, C = 50%

Prepared for New Mexico Broadcasters

Prepared by TechWare, Inc. Chantilly, VA 703-222-5842





**KOB ALBUQUERQUE NM NTSC Channel 4**

**Grade B = Green Grade A = Red**

**Longley-Rice Analysis**

**L = 99%, T = 99%, C = 99%**

**Prepared for New Mexico Broadcasters**

**Prepared by TechWare, Inc. Chantilly, VA 703-222-5842**

**KRQE Channel 13 Albuquerque, New Mexico**

**Longley-Rice Analysis**

SERVICE	F(50/50/50) (Grade B)		F(50/50/50) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	760,893	49,541	714,578	35,183
	F(99/99/99) (Grade B)		F(99/99/99) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	355,952	1,328	558	61

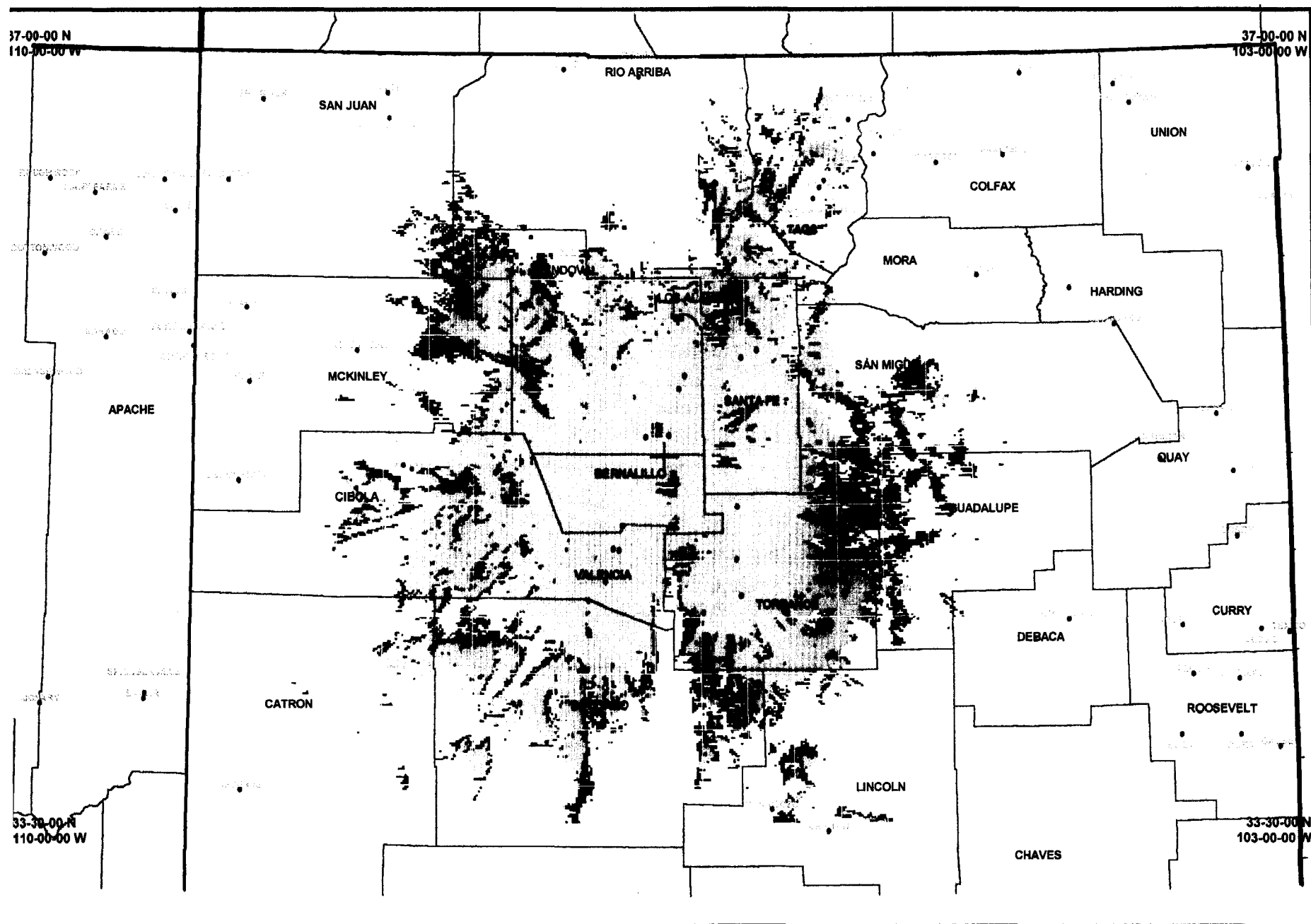
F(50/50/50) - Longley-Rice Location Variability (50%), Time Variability(50%), Confidence (50%)

F(99/99/99) - Longley-Rice Location Variability (99%), Time Variability(99%), Confidence (99%)

Prepared for: New Mexico Broadcasters December 1, 1998

Prepared by: TechWare, Inc.  
Suite 206  
14101 Parke Long Court  
Chantilly, VA 20151  
703-222-5842





**KRQE ALBUQUERQUE NM NTSC Channel 13**

**Grade B = Green Grade A = Red**

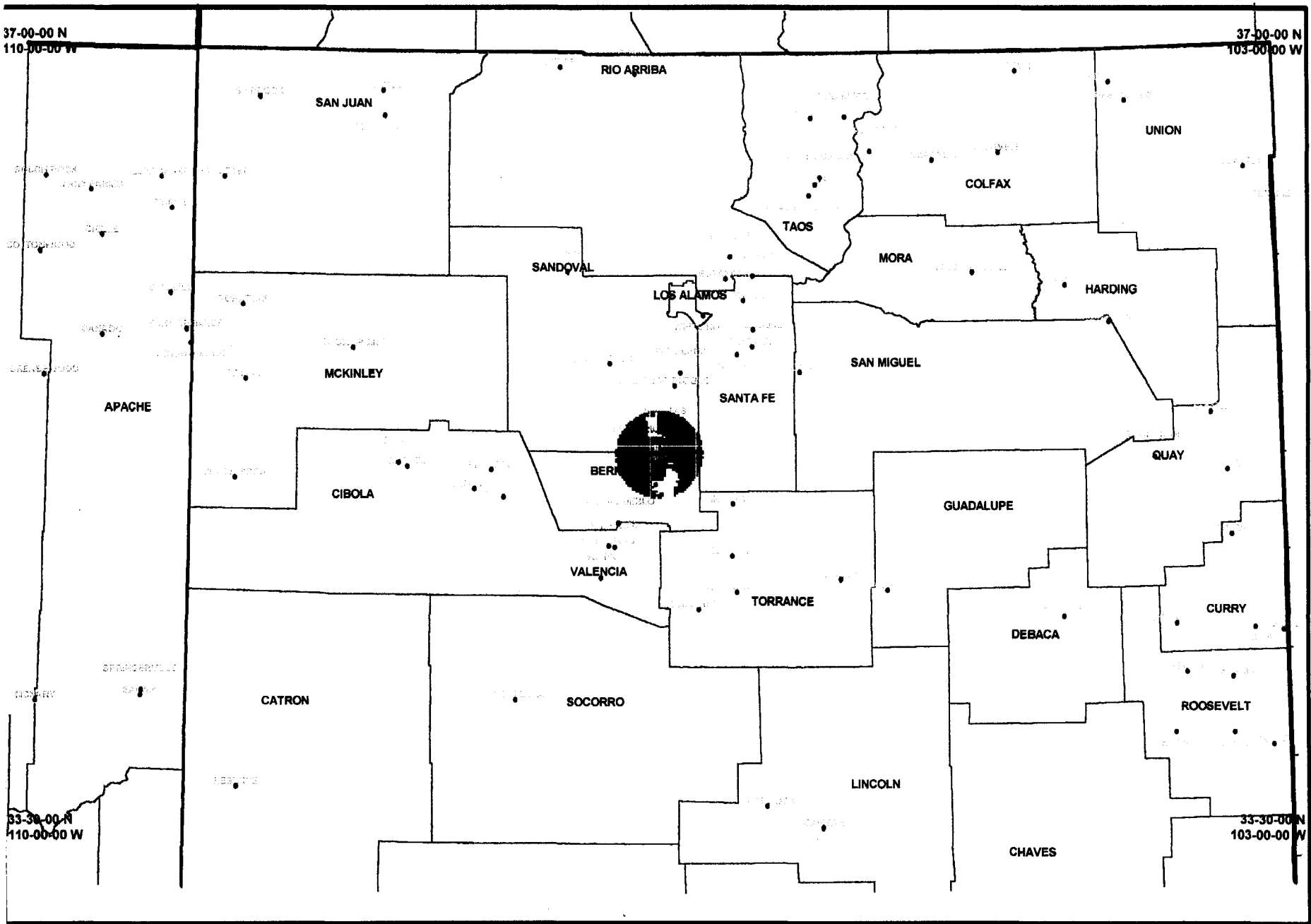
**Longley-Rice Analysis**

**L = 50%, T = 50%, C = 50%**

**Prepared for New Mexico Broadcasters**

**Prepared by TechWare, Inc. Chantilly, VA 703-222-5842**





**KRQE ALBUQUERQUE NM NTSC Channel 13**  
**Grade B = Green Grade A = Red**  
**Longley-Rice Analysis**  
**L = 99%, T = 99%, C = 99%**  
**Prepared for New Mexico Broadcasters**  
**Prepared by TechWare, Inc. Chantilly, VA 703-222-5842**



**KOCT Channel 6 Carlsbad, New Mexico**

**Longley-Rice Analysis**

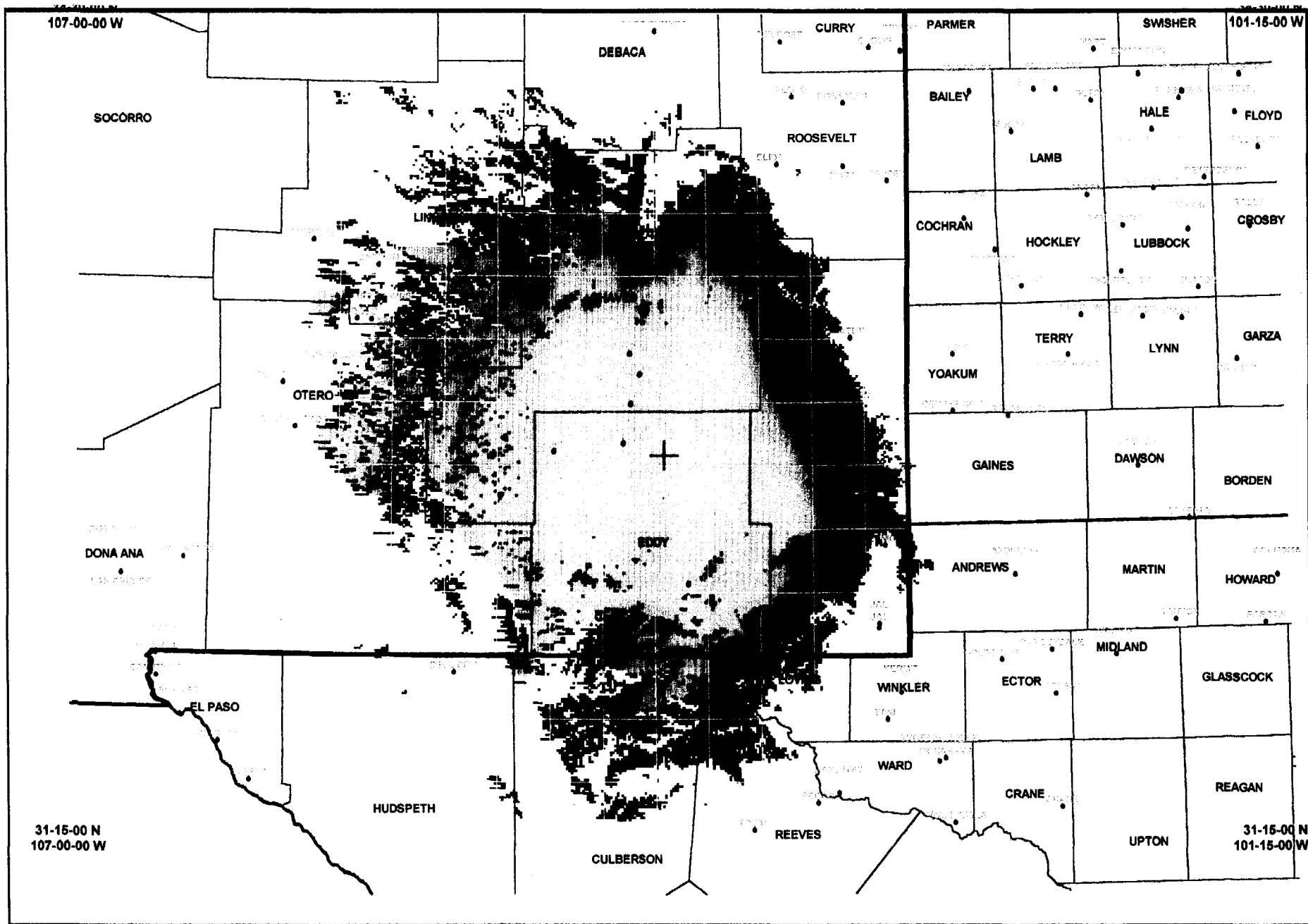
<b>SERVICE</b>	<b>F(50/50/50) (Grade B)</b>		<b>F(50/50/50) (Grade A)</b>	
	<b>Population</b>	<b>Area (Square km)</b>	<b>Population</b>	<b>Area (Square km)</b>
<b>Limited by Terrain</b>	<b>153,461</b>	<b>45,552</b>	<b>90,034</b>	<b>22,686</b>
	<b>F(99/99/99) (Grade B)</b>		<b>F(99/99/99) (Grade A)</b>	
	<b>Population</b>	<b>Area (Square km)</b>	<b>Population</b>	<b>Area (Square km)</b>
<b>Limited by Terrain</b>	<b>43,342</b>	<b>7,041</b>	<b>109</b>	<b>572</b>

**F(50/50/50) - Longley-Rice Location Variability (50%), Time Variability(50%), Confidence (50%)**

**F(99/99/99) - Longley-Rice Location Variability (99%), Time Variability(99%), Confidence (99%)**

**Prepared for: New Mexico Broadcasters December 1, 1998**

**Prepared by: TechWare, Inc.  
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Chantilly, VA 20151  
703-222-5842**



KOCT CARLSBAD NM NTSC Channel 6

Grade B = Green Grade A = Red

Longley-Rice Analysis

L = 50%, T = 50%, C = 50%

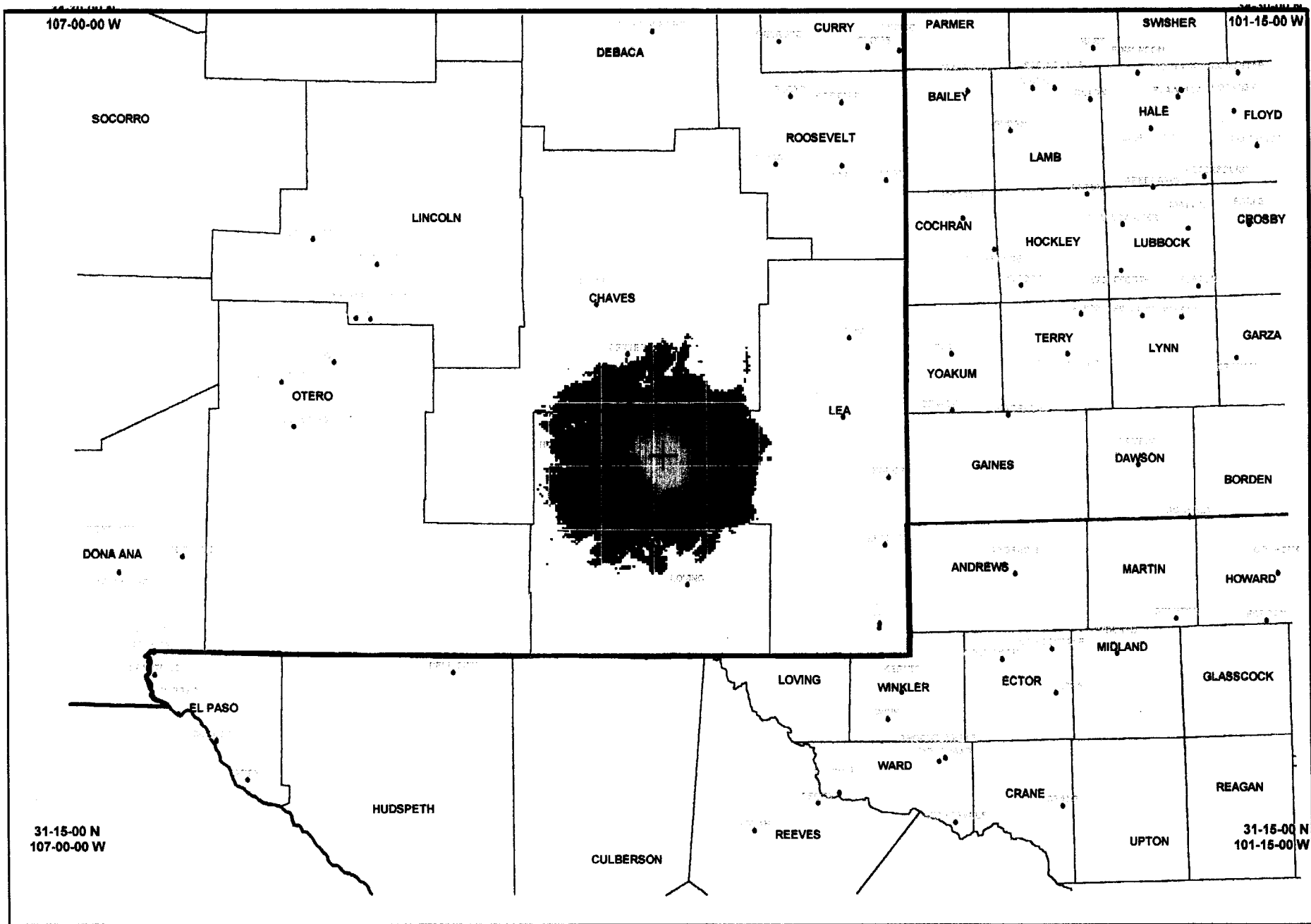
Prepared for New Mexico Broadcasters

Prepared by TechWare, Inc. Chantilly, VA 703-222-5842

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KM

250



KOCT CARLSBAD NM NTSC Channel 6

Grade B = Green Grade A = Red

Longley-Rice Analysis

L = 99%, T = 99%, C = 99%

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0

KM

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**KVIH Channel 12 Clovis, New Mexico**

**Longley-Rice Analysis**

<b>SERVICE</b>	<b>F(50/50/50) (Grade B)</b>		<b>F(50/50/50) (Grade A)</b>	
	<b>Population</b>	<b>Area (Square km)</b>	<b>Population</b>	<b>Area (Square km)</b>
Limited by Terrain	85,433	20,295	70,375	11,700

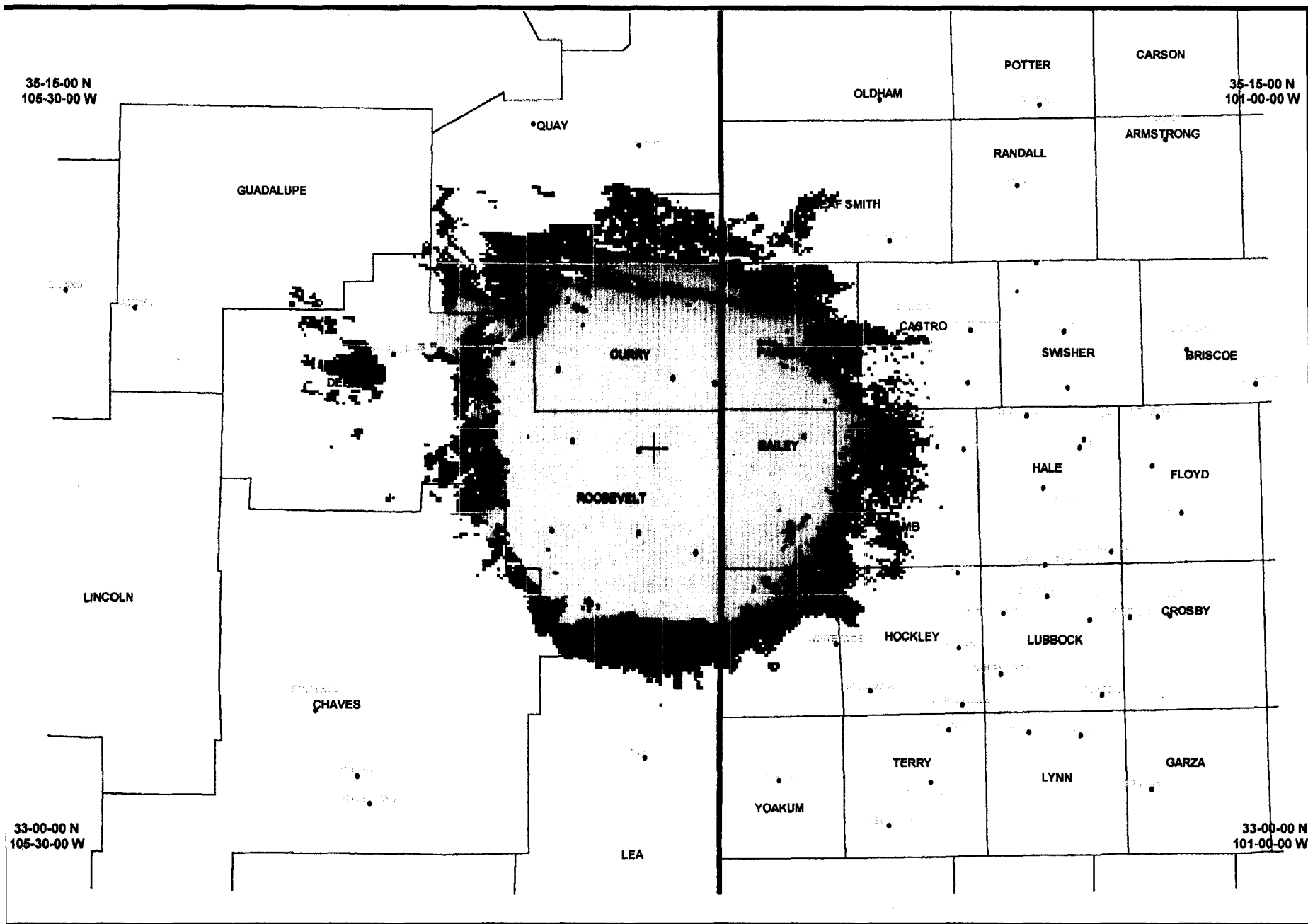
	<b>F(99/99/99) (Grade B)</b>		<b>F(99/99/99) (Grade A)</b>	
	<b>Population</b>	<b>Area (Square km)</b>	<b>Population</b>	<b>Area (Square km)</b>
Limited by Terrain	52,029	2,827	14,198	533

**F(50/50/50) - Longley-Rice Location Variability (50%), Time Variability(50%), Confidence (50%)**

**F(99/99/99) - Longley-Rice Location Variability (99%), Time Variability(99%), Confidence (99%)**

**Prepared for: New Mexico Broadcasters December 1, 1998**

**Prepared by: TechWare, Inc.  
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KVIH CLOVIS NM NTSC Channel 12

Grade B = Green Grade A = Red

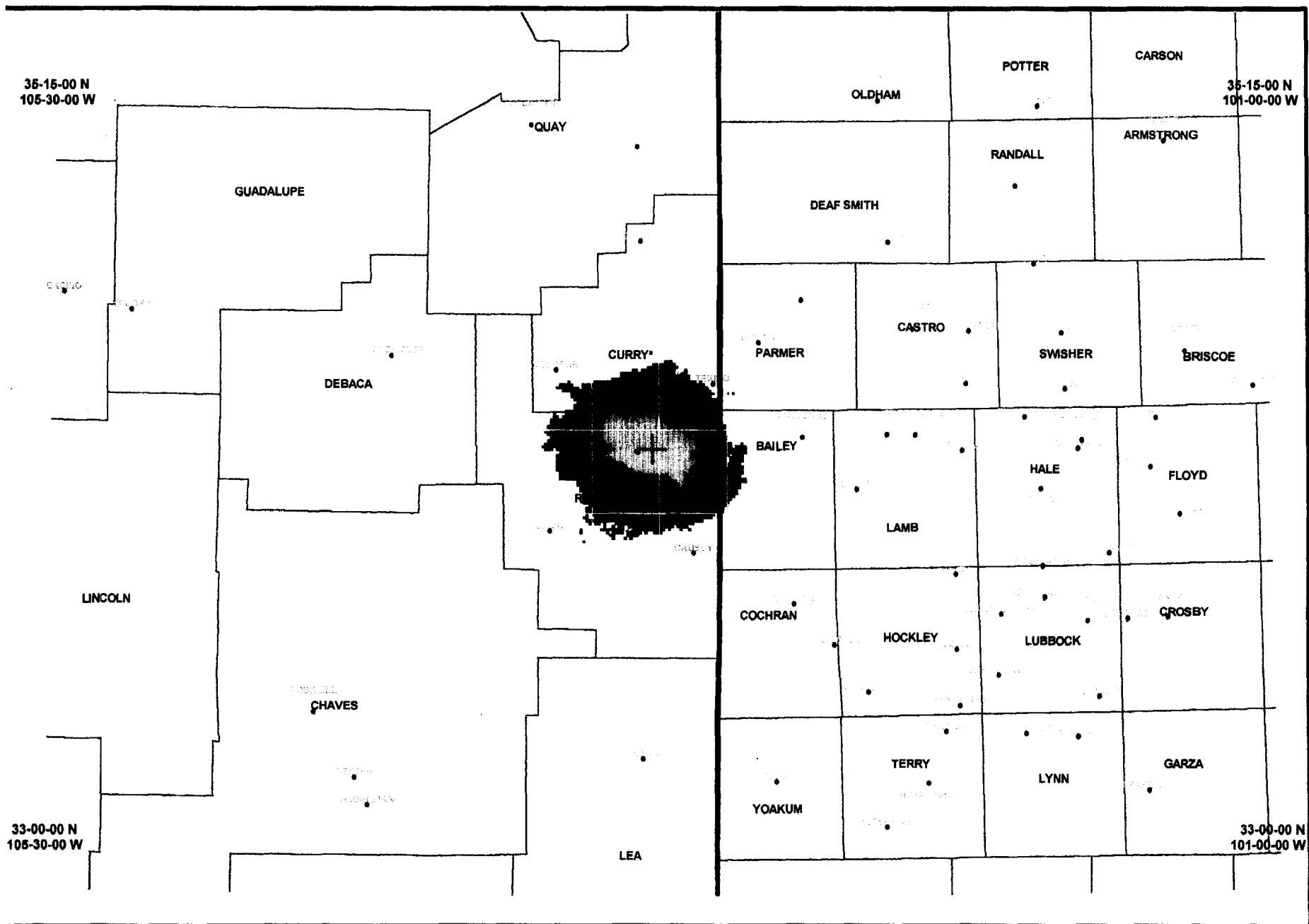
Longley-Rice Analysis

L = 50%, T = 50%, C = 50%

Prepared for New Mexico Broadcasters

Prepared by TechWare, Inc. Chantilly, VA 703-222-5842





KVIH CLOVIS NM NTSC Channel 12

Grade B = Green Grade A = Red

Longley-Rice Analysis

L = 99%, T = 99%, C = 99%

Prepared for New Mexico Broadcasters

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**KOBF Channel 12 Farmington, New Mexico**

**Longley-Rice Analysis**

SERVICE	F(50/50/50) (Grade B)		F(50/50/50) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	105,014	20,786	90,354	12,241
	F(99/99/99) (Grade B)		F(99/99/99) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	56,928	1,963	30,759	180

F(50/50/50) - Longley-Rice Location Variability (50%), Time Variability(50%), Confidence (50%)

F(99/99/99) - Longley-Rice Location Variability (99%), Time Variability(99%), Confidence (99%)

Prepared for: New Mexico Broadcasters December 1, 1998

Prepared by: TechWare, Inc.  
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37-45-00 N  
110-00-00 W

SAN JUAN

DOLORES

SAN JUAN

MINERAL

37-45-00 N  
106-15-00 W

RIO GRANDE

MONTEZUMA

ARCHULETA

CONEJOS

RIO ARriba

SAN JUAN

SANDVAL

LOS ALAMOS

35-45-00 N  
110-00-00 W

35-45-00 N  
106-15-00 W

KOBF FARMINGTON NM NTSC Channel 12

Grade B = Green Grade A = Red

Longley-Rice Analysis

L = 50%, T = 50%, C = 50%

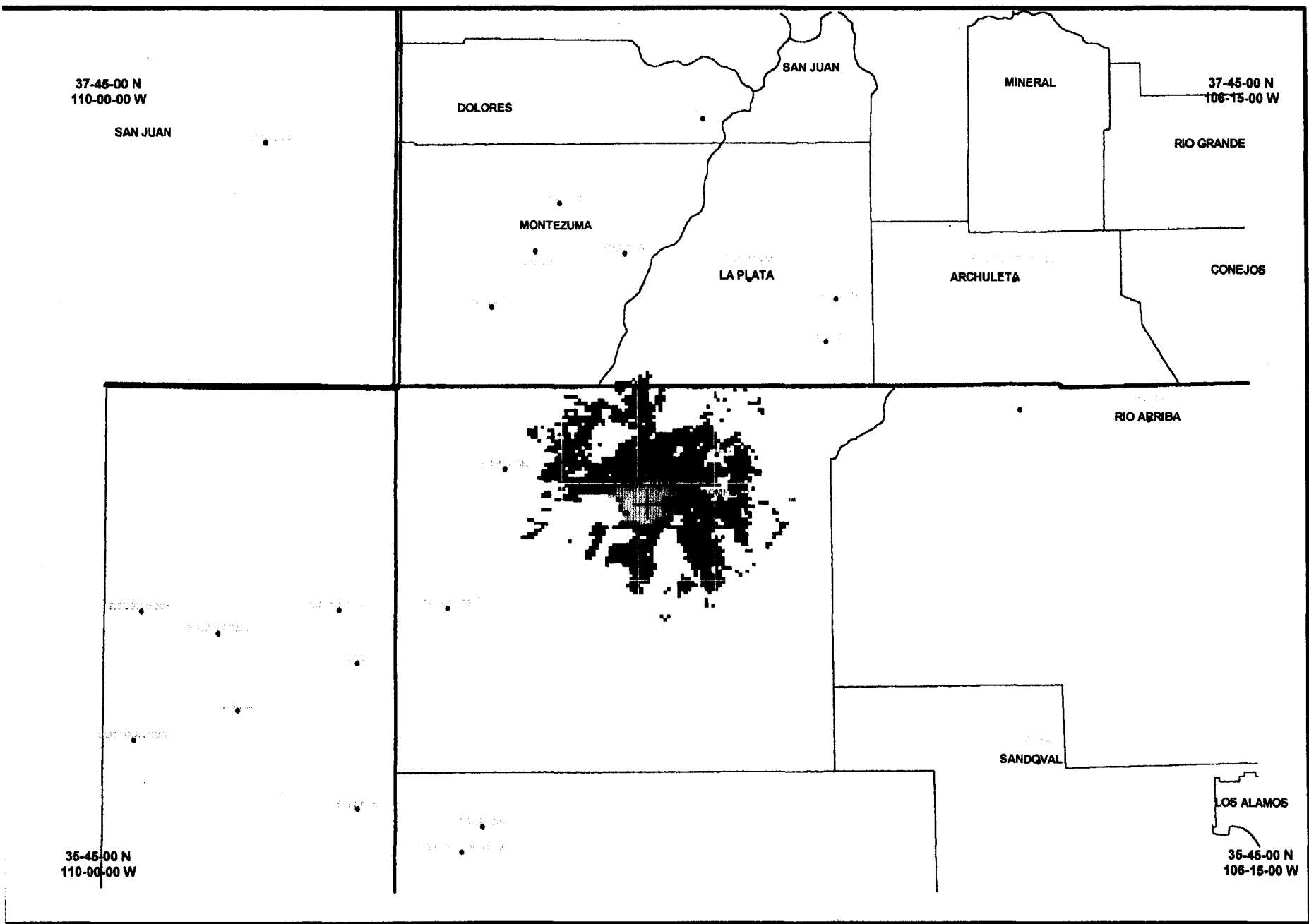
Prepared for New Mexico Broadcasters

Prepared by TechWare, Inc. Chantilly, VA 703-222-5842

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KM

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KOBF FARMINGTON NM NTSC Channel 12  
Grade B = Green Grade A = Red  
Longley-Rice Analysis  
L = 99%, T = 99%, C = 99%  
Prepared for New Mexico Broadcasters  
Prepared by TechWare, Inc. Chantilly, VA 703-222-5842



**KBIM Channel 10 Roswell, New Mexico**

**Longley-Rice Analysis**

SERVICE	F(50/50/50) (Grade B)		F(50/50/50) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	196,592	61,861	169,953	42,184
	F(99/99/99) (Grade B)		F(99/99/99) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	15,146	8,166	30	905

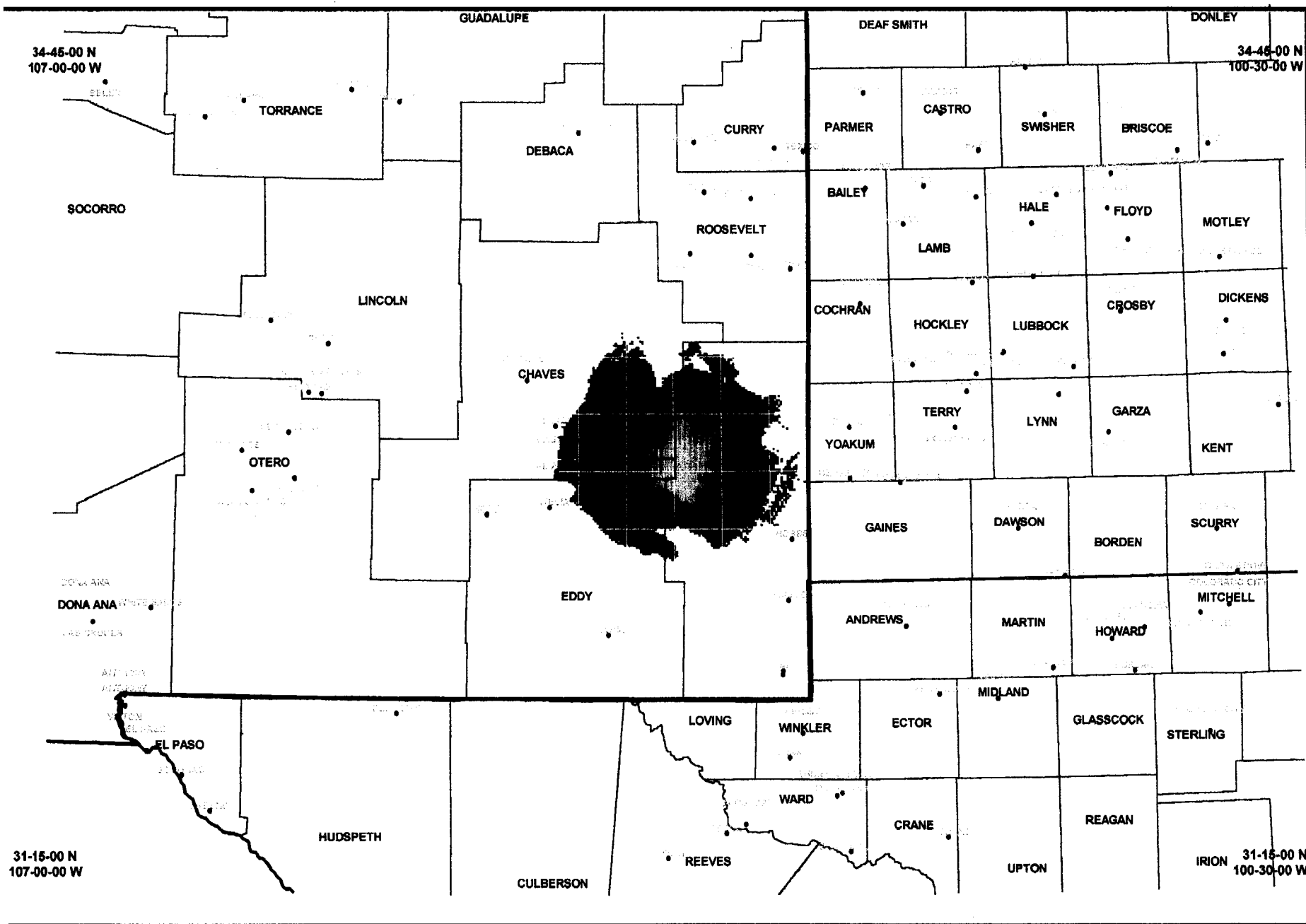
F(50/50/50) - Longley-Rice Location Variability (50%), Time Variability(50%), Confidence (50%)

F(99/99/99) - Longley-Rice Location Variability (99%), Time Variability(99%), Confidence (99%)

Prepared for: New Mexico Broadcasters December 1, 1998

Prepared by: TechWare, Inc.  
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KBIM ROSWELL NM NTSC Channel 10

Grade B = Green Grade A = Red

Longley-Rice Analysis

L = 99%, T = 99%, C = 99%

Prepared for New Mexico Broadcasters

Prepared by TechWare, Inc. Chantilly, VA 703-222-5842

**KOBR Channel 8 Roswell, New Mexico**

**Longley-Rice Analysis**

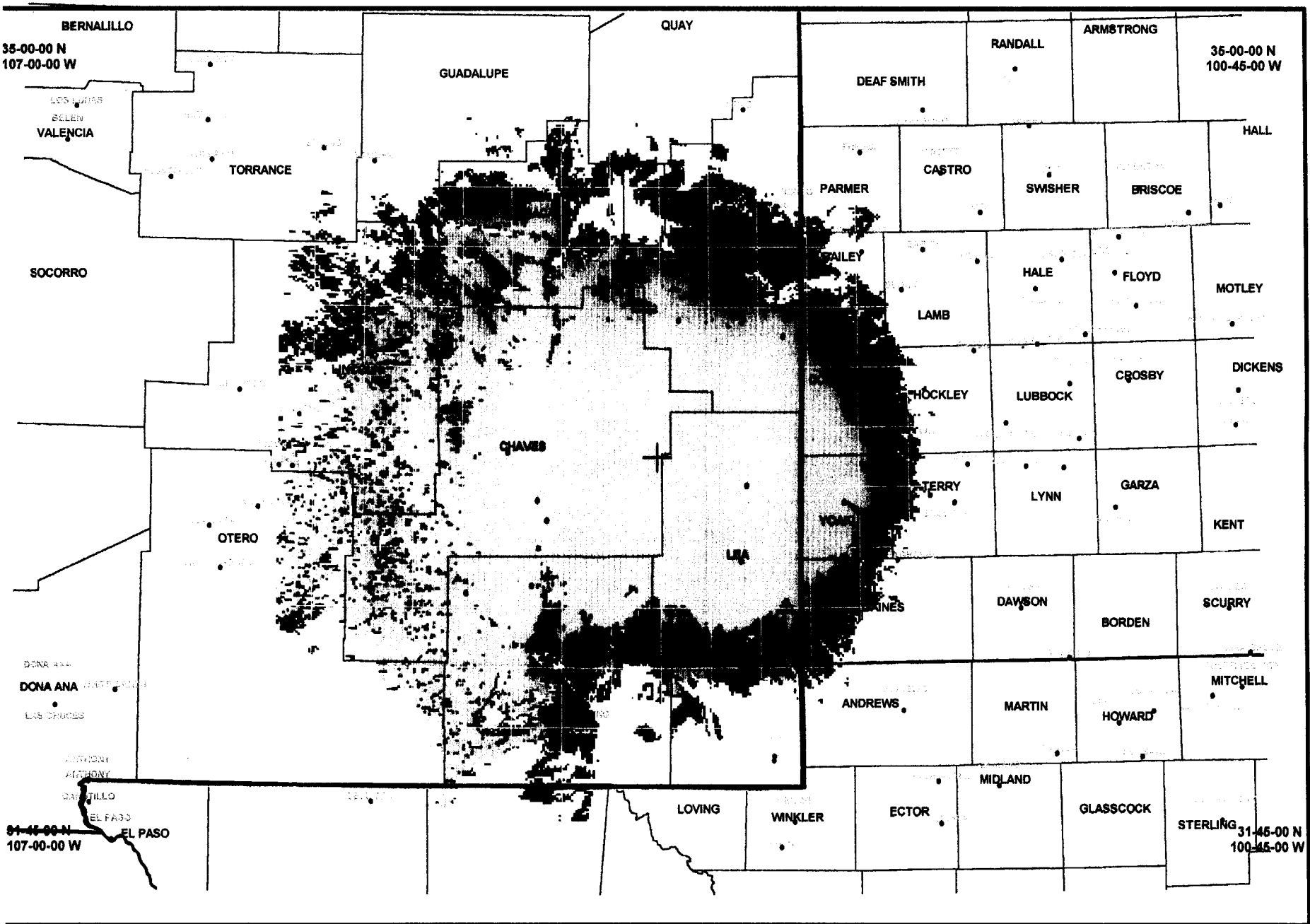
<b>SERVICE</b>	<b>F(50/50/50) (Grade B)</b>		<b>F(50/50/50) (Grade A)</b>	
	<b>Population</b>	<b>Area (Square km)</b>	<b>Population</b>	<b>Area (Square km)</b>
<b>Limited by Terrain</b>	<b>227,834</b>	<b>60,387</b>	<b>113,420</b>	<b>37,515</b>
	<b>F(99/99/99) (Grade B)</b>		<b>F(99/99/99) (Grade A)</b>	
	<b>Population</b>	<b>Area (Square km)</b>	<b>Population</b>	<b>Area (Square km)</b>
<b>Limited by Terrain</b>	<b>1,451</b>	<b>6,978</b>	<b>43</b>	<b>767</b>

**F(50/50/50) - Longley-Rice Location Variability (50%), Time Variability(50%), Confidence (50%)**

**F(99/99/99) - Longley-Rice Location Variability (99%), Time Variability(99%), Confidence (99%)**

**Prepared for: New Mexico Broadcasters December 1, 1998**

**Prepared by: TechWare, Inc.  
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KOBR ROSWELL NM NTSC Channel 8

Grade B = Green Grade A = Red

Longley-Rice Analysis

L = 50%, T = 50%, C = 50%

Prepared for New Mexico Broadcasters

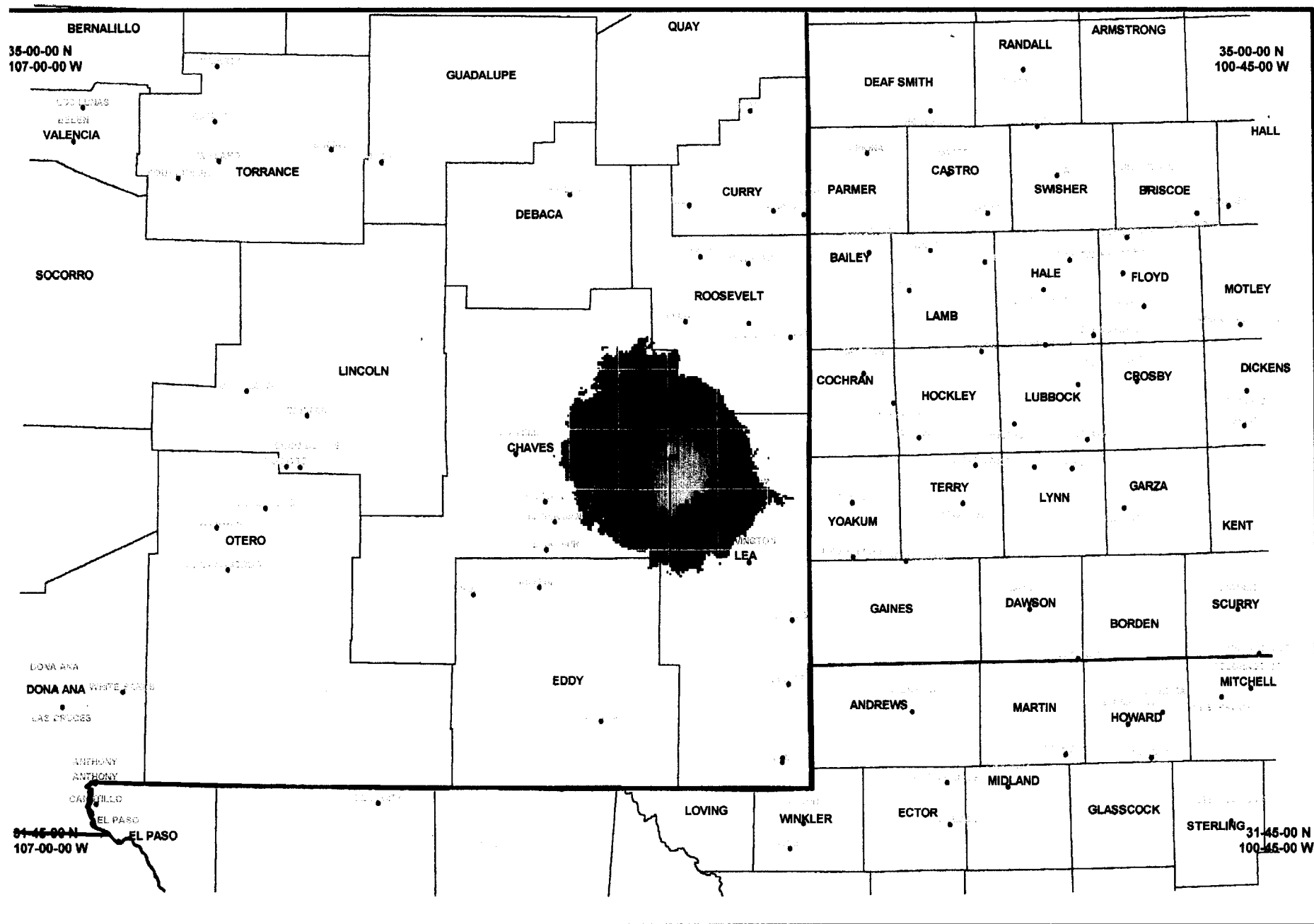
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KOBR ROSWELL NM NTSC Channel 8

Grade B = Green Grade A = Red

Longley-Rice Analysis

L = 99%, T = 99%, C = 99%

Prepared for New Mexico Broadcasters

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**KASA Channel 2 Santa Fe, New Mexico**

**Longley-Rice Analysis**

<b>SERVICE</b>	<b>F(50/50/50) (Grade B)</b>		<b>F(50/50/50) (Grade A)</b>	
	<b>Population</b>	<b>Area (Square km)</b>	<b>Population</b>	<b>Area (Square km)</b>
Limited by Terrain	813,284	80,416	735,616	36,692

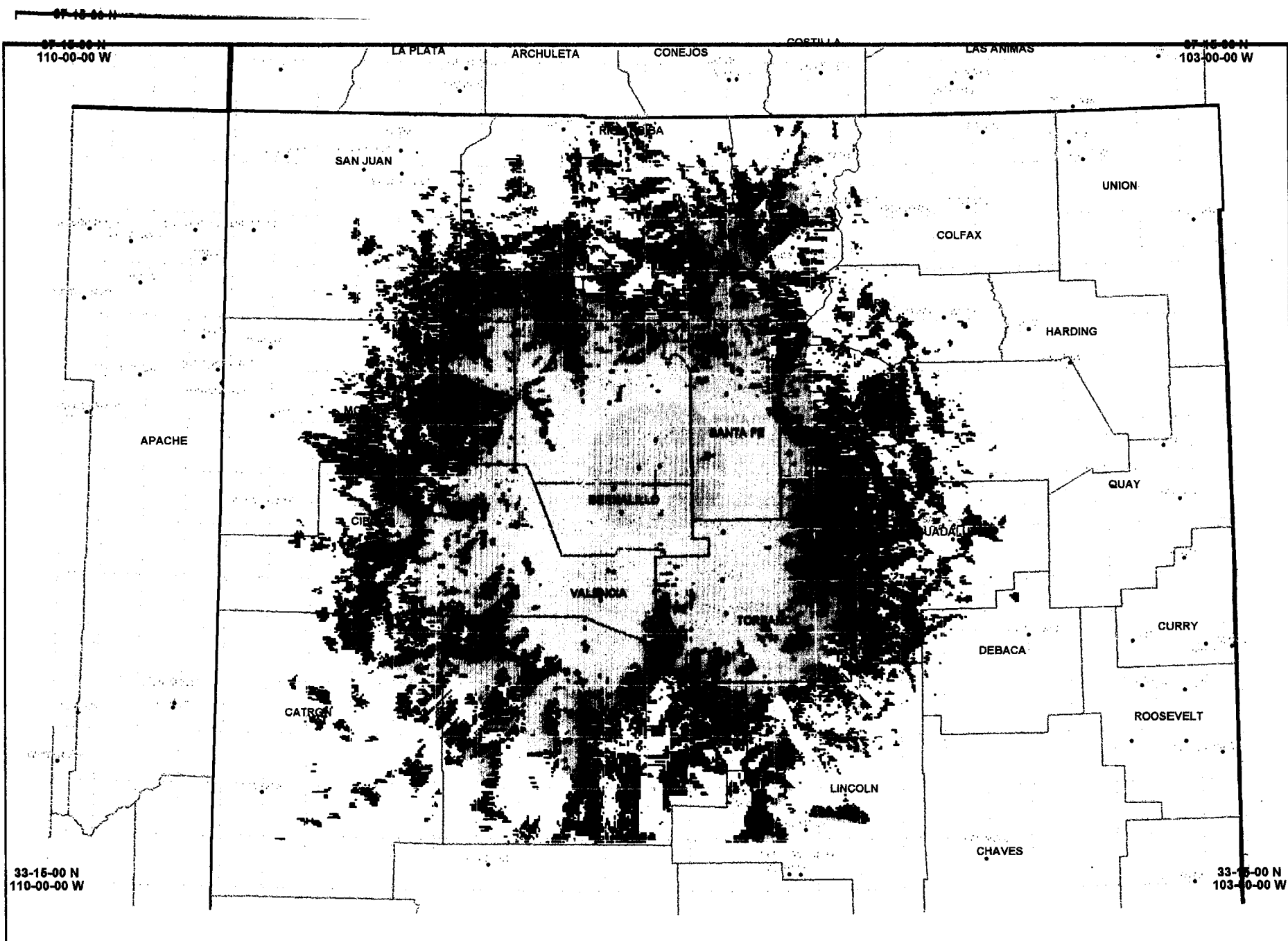
	<b>F(99/99/99) (Grade B)</b>		<b>F(99/99/99) (Grade A)</b>	
	<b>Population</b>	<b>Area (Square km)</b>	<b>Population</b>	<b>Area (Square km)</b>
Limited by Terrain	529,529	3,906	417	58

**F(50/50/50) - Longley-Rice Location Variability (50%), Time Variability(50%), Confidence (50%)**

**F(99/99/99) - Longley-Rice Location Variability (99%), Time Variability(99%), Confidence (99%)**

**Prepared for: New Mexico Broadcasters December 1, 1998**

**Prepared by: TechWare, Inc.  
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Chantilly, VA 20151  
703-222-5842**



**KASA SANTA FE NM NTSC Channel 2**

**Grade B = Green Grade A = Red**

**Longley-Rice Analysis**

**L = 50%, T = 50%, C = 50%**

**Prepared for New Mexico Broadcasters**

**Prepared by TechWare, Inc. Chantilly, VA 703-222-5842**

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KM

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**KOVT Channel 10 Silver City, New Mexico**

**Longley-Rice Analysis**

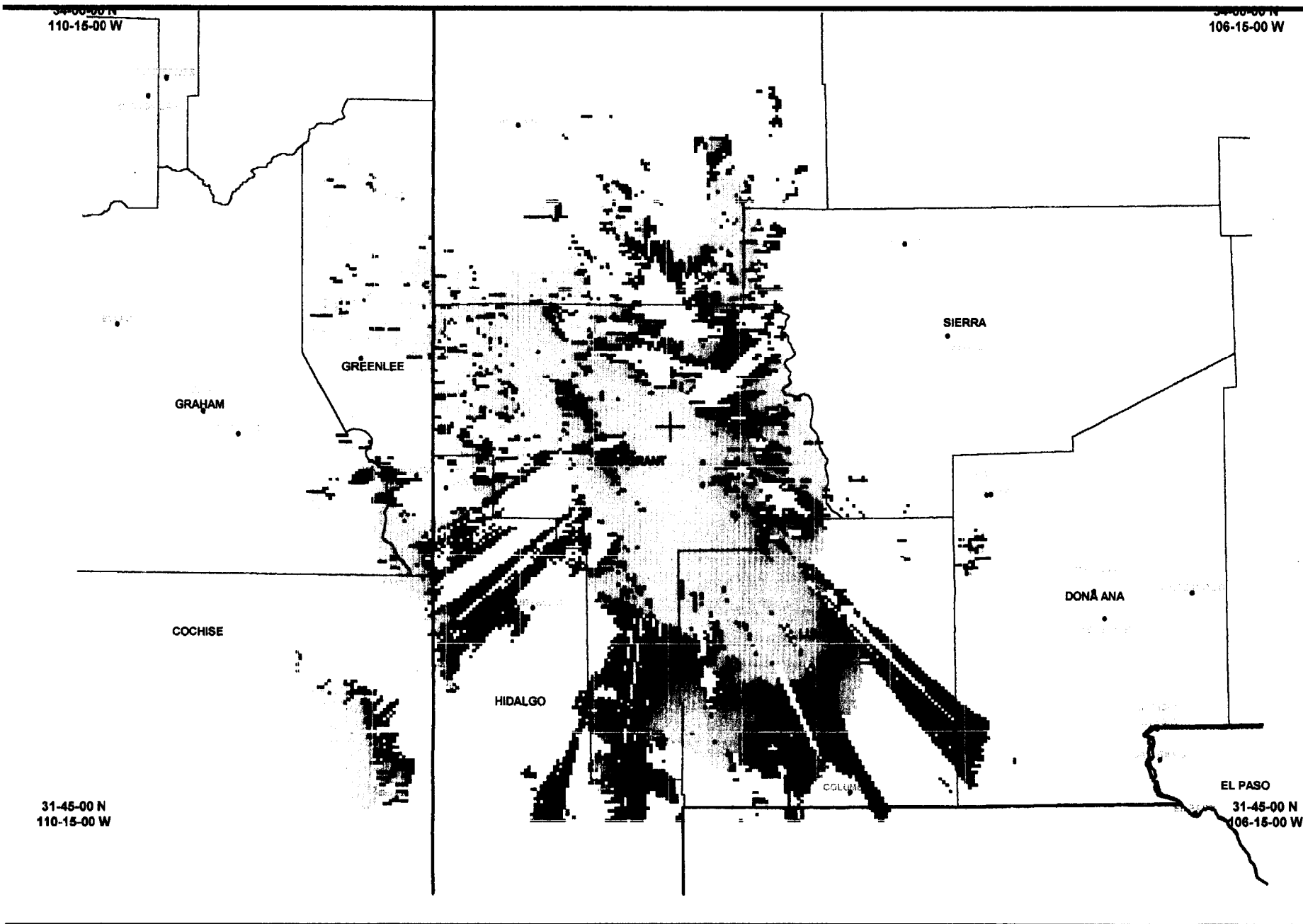
SERVICE	F(50/50/50) (Grade B)		F(50/50/50) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	45,098	17,678	41,036	9,501
	F(99/99/99) (Grade B)		F(99/99/99) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	2,963	167	183	26

F(50/50/50) - Longley-Rice Location Variability (50%), Time Variability(50%), Confidence (50%)

F(99/99/99) - Longley-Rice Location Variability (99%), Time Variability(99%), Confidence (99%)

Prepared for: New Mexico Broadcasters December 1, 1998

Prepared by: TechWare, Inc.  
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14101 Parke Long Court  
Chantilly, VA 20151  
703-222-5842



KOVT SILVER CITY NM NTSC Channel 10

Grade B = Green Grade A = Red

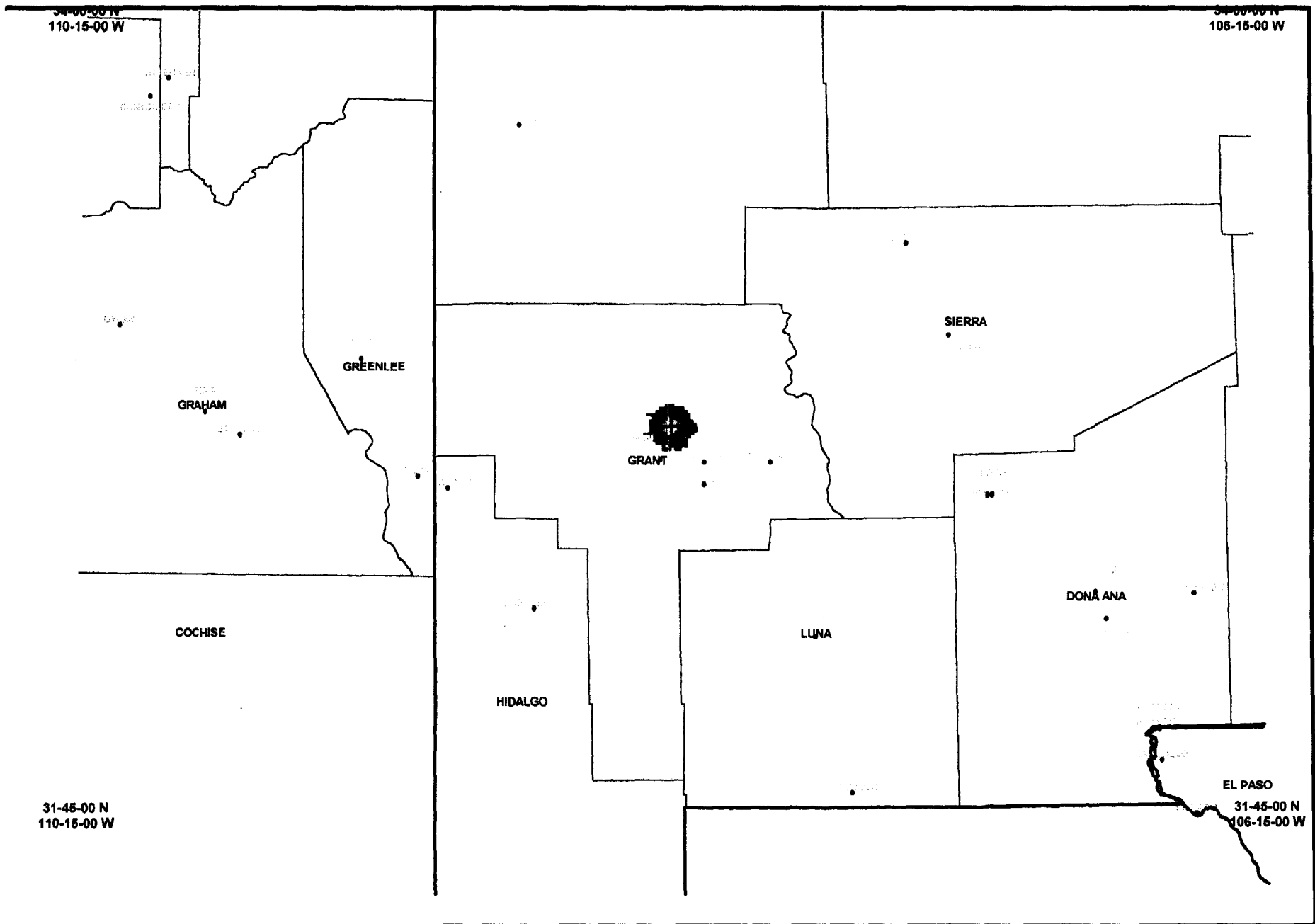
Longley-Rice Analysis

L = 50%, T = 50%, C = 50%

Prepared for New Mexico Broadcasters

Prepared by TechWare, Inc. Chantilly, VA 703-222-5842





KOVT SILVER CITY NM NTSC Channel 10

Grade B = Green Grade A = Red

Longley-Rice Analysis

L = 99%, T = 99%, C = 99%

Prepared for New Mexico Broadcasters

Prepared by TechWare, Inc. Chantilly, VA 703-222-5842

